
 United States Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460-0001		<input checked="" type="checkbox"/> Registration <input type="checkbox"/> Amendment <input type="checkbox"/> Other	OPP Identifier Number
Application for Pesticide – Section I			
1. Company/Product Number 53883-XXX		2. EPA Product Manager Mark Suarez	
4. Company/ Product (Name) CSI Abamectin Technical NC		3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted	
5. Name and Address of Applicant (Include ZIP Code) Control Solutions, Inc. 5903 Genoa-Red Bluff Pasadena, TX 77507-1041 <input type="checkbox"/> Check if this is a new address		6. Expedited Review. In accordance with FIFRA Section 3(c)(3)(b)(i) my product is similar or identical in composition and labeling to: EPA Reg. No.: 83558-26 Product Name: Abamectin Technical	
Section – II			
<input type="checkbox"/> Amendment – Explain below. <input type="checkbox"/> Resubmission in response to Agency letter dated _____ <input type="checkbox"/> Notification – Explain below.		<input type="checkbox"/> Final printed labels in response to Agency letter dated _____ <input type="checkbox"/> "Me Too" Application. <input checked="" type="checkbox"/> Other – Explain below.	
Explanation: Use additional page(s) if necessary. (For Section I and Section II.) New registration application for an abamectin technical product utilizing previously approved sources with selective citation of data.			
Section – III			
1. Material This Product Will Be Packaged In:			
Child Resistant Packaging <input type="checkbox"/> Yes* <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	2. Type of Container <input type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify): _____
*Certification must be submitted		If "Yes" Unit Packaging Wt. No. Per Container If "Yes" Packaging Wt. No. Per Container	
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 25 kg, 55 kg	5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling Accompanying Product
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Stenciled <input checked="" type="checkbox"/> Paper glued <input type="checkbox"/> Other			
Section – IV			
1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application).			
Name Leanna Bosarge		Title Director, Regulatory Affairs	Telephone No. (Include Area Code) (281) 892-2512
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.			6. Date Application Received (Stamped)
2. Signature 		3. Title Director, Regulatory Affairs	
4. Typed Name Leanna Bosarge		5. Date April 3, 2017	



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
1200 Pennsylvania Avenue, N.W.
WASHINGTON, D.C. 20460

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 1.25 hours per response for registration and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, Collection Strategies Division (2822T), U.S. Environmental Protection Agency, 1200 Pennsylvania Avenue, N.W., Washington, DC 20460. Do not send the completed form to this address.

Certification with Respect to Citation of Data

Applicant's/Registrant's Name, Address, and Telephone Number Control Solutions, Inc., 5903 Genoa Red Bluff, Pasadena, TX 77507	EPA Registration Number/File Symbol 53883-XXX
Active Ingredient(s) and/or representative test compound(s) Abamectin	Date April 3, 2017
General Use Pattern(s) (list all those claimed for this product using 40 CFR Part 158) Terrestrial Non-Food, Greenhouse non-food, Residential Outdoor, Residential Indoor, Livestock	Product Name CSI Abamectin Technical NC

NOTE: If your product is a 100% repackaging of another purchased EPA-registered product labeled for all the same uses on your label, you do not need to submit this form. You must submit the Formulator's Exemption Statement (EPA Form 8570-27).

☐ I am responding to a Data-Call-In Notice, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

SECTION I: METHOD OF DATA SUPPORT (Check one method only)

<input type="checkbox"/> I am using the cite-all method of support, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).	<input checked="" type="checkbox"/> I am using the selective method of support (or cite-all option under the selective method), and have included with this form a completed list of data requirements (the Data Matrix form must be used).
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SECTION II: GENERAL OFFER TO PAY

[Required if using the cite-all method or when using the cite-all option under the selective method to satisfy one or more data requirements]

☒ I hereby offer and agree to pay compensation, to other persons, with regard to the approval of this application, to the extent required by FIFRA.

SECTION III: CERTIFICATION

I certify that this application for registration, this form for reregistration, or this Data-Call-In response is supported by all data submitted or cited in the application for registration, the form for reregistration, or the Data-Call-In response. In addition, if the cite-all option or cite-all option under the selective method is indicated in Section I, this application is supported by all data in the Agency's files that (1) concern the properties or effects of this product or an identical or substantially similar product, or one or more of the ingredients in this product; and (2) is a type of data that would be required to be submitted under the data requirements in effect on the date of approval of this application if the application sought the initial registration of a product of identical or similar composition and uses.

I certify that for each exclusive use study cited in support of this registration or reregistration, that I am the original data submitter or that I have obtained the written permission of the original data submitter to cite that study.

I certify that for each study cited in support of this registration or reregistration that is not an exclusive use study, either: (a) I am the original data submitter; (b) I have obtained the permission of the original data submitter to use the study in support of this application; (c) all periods of eligibility for compensation have expired for the study; (d) the study is in the public literature; or (e) I have notified in writing the company that submitted the study and have offered (i) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA; and (ii) to commence negotiations to determine the amount and terms of compensation, if any, to be paid for the use of the study.

I certify that in all instances where an offer of compensation is required, copies of all offers to pay compensation and evidence of their delivery in accordance with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA are available and will be submitted to the Agency upon request. Should I fail to produce such evidence to the Agency upon request, I understand that the Agency may initiate action to deny, cancel or suspend the registration of my product in conformity with FIFRA.

I certify that the statements I have made on this form and all attachments to it are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

Signature 	Date April 3, 2017	Typed or Printed Name and Title Leanna Bosarge - Director, Regulatory Affairs
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CSI Abamectin Technical NC

For Manufacturing Use Only

ACTIVE INGREDIENT:

Abamectin (CAS No. 65195-55-3 and CAS No. 65195-56-4)97.6%

OTHER INGREDIENTS:2.4%

TOTAL:100.00%



Manufactured for:

Control Solutions, Inc
5903 Genoa Red Bluff
Pasadena, TX 77507

EPA Reg. No: 53883-408

EPA Est. No: 84456-CHN-001

KEEP OUT OF REACH OF CHILDREN WARNING

FIRST AID

IF SWALLOWED:

- Call a poison control center or doctor immediately for treatment advice.
- Have person sip a glass of water if able to swallow.
- Do not induce vomiting unless told to do so by a poison control center or doctor.
- Do not give anything by mouth to an unconscious person.

IF ON SKIN OR CLOTHING:

- Take off contaminated clothing.
- Rinse skin immediately with plenty of water for 15-20 minutes.
- Call a poison control center or doctor for treatment advice.

IF INHALED:

- Move person to fresh air.
- If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible.
- Call a poison control center or doctor for further treatment advice.

IF IN EYES:

- Hold eye open and rinse slowly and gently with water for 15-20 minutes.
- Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.
- Call a poison control center or doctor for treatment advice.

HOT LINE NUMBER

Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact SafetyCall® (866) 897-8050 for emergency medical treatment information.

NOTE TO PHYSICIAN: Early signs of intoxication include dilation of pupils, muscular incoordination, and muscular tremors. Toxicity following accidental ingestion of the technical product can be minimized by vomiting within one-half hour of exposure; rapidly after exposure (<15 minutes) administer repeatedly medical charcoal in a large quantity of water or ipecac.

If toxicity from exposure has progressed to cause severe vomiting, the extent of resultant fluid and electrolyte imbalance should be gauged. Appropriate supportive parenteral fluid replacement therapy should be given, along with other required supportive measures (such as maintenance of blood pressure levels and proper respiratory functionality) as indicated by clinical signs, symptoms, and measurements.

In severe cases, observations should continue for at least several days until clinical condition is stable and normal. Since abamectin is believed to enhance GABA activity in animals, it is probably wise to avoid drugs that enhance GABA activity (barbiturates, benzodiazepines, valproic acid) in patients with potentially toxic abamectin exposure.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

WARNING: May be fatal if swallowed, absorbed through skin or if inhaled. Causes moderate eye irritation. Do not breathe dust. Do not get in eyes, on skin, or on clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco, or using the toilet. Remove and wash contaminated clothing before reuse. Keep container tightly closed. Keep away from food, drink, and animal feeding stuffs.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

Wear coveralls over short sleeved shirt and short pants, socks, chemical resistant footwear, chemical resistant gloves made of: barrier laminate, butyl rubber (> 14 mils), nitrile rubber (> 14 mils), neoprene rubber (> 14 mils), natural rubber (> 14 mils), polyethylene, polyvinyl chloride (PVC) (> 14 mils), or viton (> 14 mils) and goggles. Wear a minimum of a NIOSH-approved particulate filtering faceplate respirator with any N, R, or P filter (TC-84P) OR an elastometric NIOSH-approved particulate respirator with an N, R, or P filter OR a NIOSH powered air purifying respirator with an HE filter (TC-21C).

ENVIRONMENTAL HAZARDS

This product is toxic to fish and wildlife. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or other waters unless in accordance with requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the Environmental Protection Agency.

DIRECTIONS FOR USE

It is a violation of federal law to use this product in a manner inconsistent with its labeling. This product is for the formulation of insecticide baits and non-food crop insecticide/miticide spray formulations and is not for resale under this label.

1. **Agricultural premises not accessible to livestock and around equipment (Indoor Non-Food, Terrestrial Non-Food):** Around barns, chicken houses, and agricultural equipment.

2. **Commercial and Industrial use (Indoor, Terrestrial Non-Food):** In and around commercial, institutional, and industrial premises such as warehouses, hotels, motels, resorts, apartment buildings, food storage areas, meat packing and food processing plants, food handling establishments, supermarkets, restaurants, non-patient occupied areas of hospitals and nursing homes, schools, commercial transportation equipment such as buses, boats, ships, trains, aircraft except aircraft cabins, utility conduits, and utility boxes.
3. **Household (Domestic indoor and outdoor use):** In and around residential buildings such as homes, apartments, garages, sheds, storage buildings, and other household and domestic structures.
4. **Livestock (Terrestrial Food):** Cattle ear tags
5. **Ornamental plants (Terrestrial Non-Food, Greenhouse Non-Food):** Ornamental herbaceous plants, ornamental woody shrubs and vines, ornamental and/or shade trees, ornamental nonflowering plants, and Christmas tree plantations.
6. **Turf and other outdoor areas (Domestic Outdoor, Terrestrial Non-Food):** Ornamental lawns and turf, commercial sod farms, golf courses, Noncrop areas: landscapes, recreation areas (fairgrounds, race tracks, tennis courts, and parks).
7. **Other Uses:** Uses for which the US EPA has accepted the required data and/or citations of data that the formulator has submitted in support of registration excluding any use strictly prohibited by this label. Uses for experimental purposes that are in compliance with the US EPA's requirements.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

PESTICIDE STORAGE: Store CSI Abamectin Technical NC in a cool, dry place away from food, drink, and animal feeding stuffs. If spilled, do not flush to waterways (see **ENVIRONMENTAL HAZARDS**). Carefully collect and containerize spilled material in a manner that produces the least amount of airborne dust. Wear suitable protective equipment during any spill cleanup operation (see **PRECAUTIONARY STATEMENTS**). Remove residual surface material with towels moistened with methanol.

PESTICIDE DISPOSAL: Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of federal law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

CONTAINER HANDLING: Nonrefillable container. Do not reuse or refill this container. Offer for recycling if available.

Polyliner (Plastic bag): Completely empty bag into application equipment. Offer for recycling if available or dispose of bag in a sanitary landfill or by other procedures allowed by state and local authorities.

Plastic Containers: Nonrefillable container. Do not reuse or refill this container. Clean container promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank. Fill the container 1/4 full with water. Replace and tighten closures. Tip container on its side and roll it back and forth, ensuring at least one complete revolution, for 30 seconds. Stand the container on its end and tip it back and forth several times. Turn the container over onto its other end and tip it back and forth several times. Empty the rinsate into formulation equipment or a mix tank or store rinsate for later use or disposal. Repeat this procedure two more times. Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill or by other procedures allowed by state and local authorities.

Metal Container: Nonrefillable container. Do not reuse or refill this container. Clean container promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank. Fill the container 1/4 full with water. Replace and tighten closures. Tip container on its side and roll it back and forth, ensuring at least one complete revolution, for 30 seconds. Stand the container on its end and tip it back and forth several times. Turn the container over onto its other end and tip it back and forth several times. Empty the rinsate into formulation equipment or a mix tank or store rinsate for later use or disposal. Repeat this procedure two more times. Then offer for recycling, if available, or reconditioning, or if appropriate, puncture and dispose of in a sanitary landfill, or by other procedures approved by State and local authorities.

WARRANTY STATEMENT

The Directions for Use of this product must be followed carefully. It is impossible to eliminate all risks inherently associated with the use of this product. Ineffectiveness or other unintended consequences may result because of such factors as manner of use or application, weather, presence of other materials or other influencing factors in the use of the product, which are beyond the control of Control Solutions, Inc. or Seller. All such risks shall be assumed by Buyer and User, and Buyer and User agree to hold Control Solutions, Inc. and Seller harmless for any claims relating to such factors.

To the extent consistent with applicable law, Control Solutions, Inc. warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated in the Directions for Use, subject to the inherent risks referred to above, when used in accordance with directions under normal use conditions. This warranty does not extend to the use of this product contrary to label instructions, or under abnormal conditions or under conditions not reasonably foreseeable to or beyond the control of Seller or Control Solutions, Inc., and Buyer and User assume the risk of any such use. CONTROL SOLUTIONS, INC. MAKES NO WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE NOR ANY OTHER EXPRESS OR IMPLIED WARRANTY EXCEPT AS STATED ABOVE.

To the extent consistent with applicable law, IT IS CONTROL SOLUTIONS INC., AND SELLERS INTENTION THAT in no event shall Control Solutions or Seller be liable for any incidental, consequential or special damages resulting from the use or handling of this product. **THE EXCLUSIVE REMEDY OF THE USER OR BUYER, AND THE EXCLUSIVE LIABILITY OF CONTROL SOLUTIONS, INC., AND SELLER FOR ANY AND ALL CLAIMS, LOSSES, INJURIES OR DAMAGES (INCLUDING CLAIMS BASED ON BREACH OF WARRANTY, CONTRACT, NEGLIGENCE, TORT, STRICT LIABILITY OR OTHERWISE) RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, SHALL BE THE RETURN OF THE PURCHASE PRICE OF THE PRODUCT OR, AT THE ELECTION OF CONTROL SOLUTIONS, INC. OR SELLER, THE REPLACEMENT OF THE PRODUCT.**

To the extent consistent with applicable law, Control Solutions, Inc. and Seller offer this product, and Buyer and User accept it, subject to the foregoing Conditions of Sale and Limitation of Warranty and Liability, which may not be modified except by written agreement signed by a duly authorized representative of Control Solutions, Inc.

Net Contents: 2.2 Pounds (1 Kilogram)

CSI Abamectin Technical NC

For Manufacturing Use Only

ACTIVE INGREDIENT:

Abamectin (CAS No. 65195-55-3 and CAS No. 65195-56-4)97.6%
OTHER INGREDIENTS:2.4%
TOTAL:100.00%

Manufactured for:
Control Solutions, Inc
5903 Genoa Red Bluff
Pasadena, TX 77507

EPA Reg. No: 53883-408
EPA Est. No: 84456-CHN-001



KEEP OUT OF REACH OF CHILDREN

WARNING

FIRST AID	
IF SWALLOWED:	<ul style="list-style-type: none">• Call a poison control center or doctor immediately for treatment advice.• Have person sip a glass of water if able to swallow.• Do not induce vomiting unless told to do so by a poison control center or doctor.• Do not give anything by mouth to an unconscious person.
IF ON SKIN OR CLOTHING:	<ul style="list-style-type: none">• Take off contaminated clothing.• Rinse skin immediately with plenty of water for 15-20 minutes.• Call a poison control center or doctor for treatment advice.
IF INHALED:	<ul style="list-style-type: none">• Move person to fresh air.• If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible.• Call a poison control center or doctor for further treatment advice.
IF IN EYES:	<ul style="list-style-type: none">• Hold eye open and rinse slowly and gently with water for 15-20 minutes.• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.• Call a poison control center or doctor for treatment advice.
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3. **Household (Domestic indoor and outdoor use):** In and around residential buildings such as homes, apartments, garages, sheds, storage buildings, and other household and domestic structures.
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WARRANTY STATEMENT

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To the extent consistent with applicable law, Control Solutions, Inc. warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated in the Directions for Use, subject to the inherent risks referred to above, when used in accordance with directions under normal use conditions. This warranty does not extend to the use of this product contrary to label instructions, or under abnormal conditions or under conditions not reasonably foreseeable to or beyond the control of Seller or Control Solutions, Inc., and Buyer and User assume the risk of any such use. CONTROL SOLUTIONS, INC. MAKES NO WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE NOR ANY OTHER EXPRESS OR IMPLIED WARRANTY EXCEPT AS STATED ABOVE.

To the extent consistent with applicable law, IT IS CONTROL SOLUTIONS INC., AND SELLERS INTENTION THAT in no event shall Control Solutions or Seller be liable for any incidental, consequential or special damages resulting from the use or handling of this product. **THE EXCLUSIVE REMEDY OF THE USER OR BUYER, AND THE EXCLUSIVE LIABILITY OF CONTROL SOLUTIONS, INC., AND SELLER FOR ANY AND ALL CLAIMS, LOSSES, INJURIES OR DAMAGES (INCLUDING CLAIMS BASED ON BREACH OF WARRANTY, CONTRACT, NEGLIGENCE, TORT, STRICT LIABILITY OR OTHERWISE) RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, SHALL BE THE RETURN OF THE PURCHASE PRICE OF THE PRODUCT OR, AT THE ELECTION OF CONTROL SOLUTIONS, INC. OR SELLER, THE REPLACEMENT OF THE PRODUCT.**

To the extent consistent with applicable law, Control Solutions, Inc. and Seller offer this product, and Buyer and User accept it, subject to the foregoing Conditions of Sale and Limitation of Warranty and Liability, which may not be modified except by written agreement signed by a duly authorized representative of Control Solutions, Inc.

Net Contents: 55.1 Pounds (25 Kilograms)

97020203Y_201805
97020209Y_201805



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the form to this address.

DATA MATRIX

Date April 3, 2017	EPA Reg. No./File Symbol 53883-XXX	Page 1 of 14
Applicant's / Registrant's Name & Address Control Solutions Inc. 5903 Genoa Red Bluff Pasadena, TX 77507	Product Abamectin Technical NC	
Ingredient Abamectin (CAS No. 71751-41-2)		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.1550	Product Identity and Composition	45544001 49212701 49405502 50162001	Celsius Property B.V.	PERM	
830.1600	Description of Materials Used to Produce the Product	45544001 49212701 49405502 50162001	Celsius Property B.V.	PERM	
830.1620	Description of Production Process	45544001 49212701 49405502 50162001	Celsius Property B.V.	PERM	
830.1650	Description of Formulation Process				Not Required ¹
830.1670	Discussion of Formation of Impurities	45544001 49212701 49405502 50162001	Celsius Property B.V.	PERM	
830.1700	Preliminary Analysis	45544002 45747501 49212702 49405503 50162002	Celsius Property B.V.	PERM	
830.1750	Certified Limits	49212702 49405503 50162002	Celsius Property B.V.	PERM	

Signature 	Name and Title Leanna Bosarge, Dir. Regulatory Affairs	Date April 3, 2017
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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Applicant's / Registrant's Name & Address Control Solutions Inc. 5903 Genoa Red Bluff Pasadena, TX 77507	Product Abamectin Technical NC	
Ingredient Abamectin (CAS No. 71751-41-2)		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.1800	Enforcement Analytical Method	49212702 49405503 50162002	Celsius Property B.V.	PERM	
830.6302	Color	45747501	Celsius Property B.V.	PERM	
830.6303	Physical State	45747501	Celsius Property B.V.	PERM	
830.6304	Odor	45747501	Celsius Property B.V.	PERM	
830.6313	Stability to Normal and Elevated Temperatures, Metals, and Metal Ions	45747501	Celsius Property B.V.	PERM	
830.6314	Oxidation/Reduction: Chemical Incompatibility	49212703	Celsius Property B.V.	PERM	
830.6315	Flammability	49212703	Celsius Property B.V.	PERM	
830.6316	Explosibility	48158703 49212703	Celsius Property B.V.	PERM	
830.6317	Storage Stability	48158703 49212703	Celsius Property B.V.	PERM	
830.6319	Miscibility	48158703 49212703	Celsius Property B.V.	PERM	
830.6320	Corrosion Characteristics	46820901 46821001 48158703 49212703	Celsius Property B.V.	PERM	
830.6321	Dielectric Breakdown Voltage	49212703 48158703	Celsius Property B.V.	PERM	

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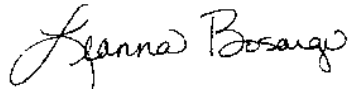
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Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.7000	pH	45747501	Celsius Property B.V.	PERM	
830.7050	UV/Visible Absorption	45747501	Celsius Property B.V.	PERM	
830.7100	Viscosity	49212703	Celsius Property B.V.	PERM	
830.7200	Melting Point/Melting Range	45747501	Celsius Property B.V.	PERM	
830.7220	Boiling Point/Boiling Range	49212703	Celsius Property B.V.	PERM	
830.7300	Density/Relative Density/Bulk Density	45747501	Celsius Property B.V.	PERM	
830.7370	Dissociation Constants in Water	45747501	Celsius Property B.V.	PERM	
830.7520	Particle Size, Fiber Length, and Diameter Distribution	49212703	Celsius Property B.V.	PERM	
830.7570	Partition Coefficient (n-octanol/water), Estimation by Liquid Chromatography	45747501	Celsius Property B.V.	PERM	
830.7840	Water Solubility: Column Elution Method; Shake Flask Method	45747501	Celsius Property B.V.	PERM	
830.7950	Vapor Pressure	45747501	Celsius Property B.V.	PERM	
870.1100	Acute Oral Toxicity: Rat	45544003 46208201	Celsius Property B.V.	PERM	
870.1200	Acute Dermal Toxicity: Rat	45544004	Celsius Property B.V.	PERM	
870.1300	Acute Inhalation Toxicity: Rat	45544005	Celsius Property B.V.	PERM	
870.2400	Primary Eye Irritation: Rabbit	45544006	Celsius Property B.V.	PERM	
870.2500	Primary Dermal Irritation: Rabbit	45544007	Celsius Property B.V.	PERM	
870.2600	Dermal Sensitization	45544008	Celsius Property B.V.	PERM	

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Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
850.2100	Acute Avian Oral Toxicity	00097859 250762 49921406	Syngenta Crop Protection	OLD OLD PAY	See endnote ²
850.2200	Acute Avian Dietary Toxicity	250761 250763		OLD OLD	See endnote ³
850.2400	Wild Mammal Toxicity				Not required
850.2300	Avian Reproductive Toxicity	40318601		OLD GAP	See endnote ⁴
850.2500	Simulated or Actual Field Testing				Not required
850.1075	Freshwater Fish Toxicity	00088780 00153797 00088782 00180910 00153588		OLD OLD OLD OLD OLD	See endnote ⁵
850.1010	Freshwater Invertebrate Toxicity	00088784		OLD	See endnote ⁶
850.1075	Estuarine/Marine Fish Toxicity	00150910		OLD	See endnote ⁷
850.1025, 850.1035, 850.1045, 850.1055	Acute Toxicity Estuarine and Marine Organisms	40856305 00159158 00450565		OLD OLD OLD	See endnote ⁸
850.1300	Aquatic Invertebrate Life Cycle (Freshwater)	00153570 49921403	Syngenta Crop Protection	OLD PAY	See endnote ⁹
850.1350	Aquatic Invertebrate Life Cycle (Saltwater)	00150910		OLD	See endnote ¹⁰
850.1400	Fish Early Life Stage (Freshwater)	40069609		OLD	See endnote ¹¹
850.1400	Fish Early Life Stage (Saltwater)			GAP	See endnote ¹²
850.1500	Life Cycle Fish				Not required

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Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
850.1710, 850.1730, 850.1850	Aquatic Organisms Bioavailability, Biomagnification, Toxicity	159163 161178		OLD OLD	See endnote ¹³
850.1950	Simulated or Actual Field Testing for Aquatic Organisms				Not required
850.1735	Whole sediment: Acute Freshwater Invertebrates				Not required
850.1740	Whole sediment: Acute Marine Invertebrates	49921405	Syngenta Crop Protection	PAY	See endnote ¹⁴
SS-WholeSedIn	Whole sediment Chronic Toxicity Test: Freshwater and Marine Invertebrates	49921401 49921402	Syngenta Crop Protection	PAY PAY	See endnote ¹⁵
850.3020	Honey Bee Acute Contact Toxicity	00159162		OLD	See endnote ¹⁶
850.3030	Honey Bee Toxicity of Residues on Foliage	49226801	Syngenta Crop Protection	PAY	See endnote ¹⁷
850.3040	Semi-Field Test for Pollinators	49442801 49921901	Syngenta Crop Protection	PAY PAY	See endnote ¹⁸
SS-1154	Acute Honey Bee Larvae Feeding Study	49789301 49789302	Syngenta Crop Protection	PAY PAY	See endnote ¹⁹
SS-1108	Honey Bee Acute Oral Toxicity			GAP	See endnote ²⁰
870.6100	Delayed Neurotoxicity (Acute) – Rat	46959202	Syngenta Crop Protection	PAY	See endnote ²¹
870.6200	Acute Neurotoxicity – Rat				Not required
870.3100	90-Day Oral: Rodent	00131081		OLD	See endnote ²²
870.3150	90-Day Oral: Non-Rodent	00131082 00164152		OLD OLD	See endnote ²³
870.3200	21/28 Day Dermal Toxicity				Not required ²⁴
870.3250	90-Day Dermal Toxicity				Not required

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Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
870.3465	90-Day Inhalation Toxicity	46921502	Syngenta Crop Protection	PAY	See endnote ²⁵
870.6100	28-Day Delayed Neurotoxicity Hen				Not required
870.6200	90-Day Neurotoxicity – Rat	46959201 47116201	Syngenta Crop Protection	PAY PAY	See endnote ²⁶
870.4100	Chronic Oral Rat	40375510		OLD	See endnote ²⁷
870.4300	Combined Chronic Toxicity/Carcinogenicity	40069601 40069602 40375511 40375512 40517801		OLD OLD OLD OLD OLD	See endnote ²⁸
870.3700	Prenatal Developmental Toxicity Study	073759 073761 265564 00096446 00130819 40713406 40912701 44160501 44179902		OLD OLD OLD OLD OLD OLD OLD OLD	See endnote ²⁹
870.3800	Reproduction and Fertility Effects	00164151 40713404		OLD OLD	See endnote ³⁰
870.6300	Developmental Neurotoxicity Study	46727401 46727402 46727403	Syngenta Crop Protection	PAY PAY PAY	See endnote ³¹

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Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
870.5100	Bacterial Reverse Mutation Test	246894 265568 265569 40713402 40713405		OLD OLD OLD OLD OLD	See endnote ³²
870.5300	<i>In Vitro</i> Mammalian Cell Assay	265570 MRID Unavailable		OLD OLD	See endnote ³³
870.5395	<i>In Vivo</i> Cytogenetics	MRID Unavailable		OLD	See endnote ³⁴
870.5550	Unscheduled DNA Synthesis in Mammalian Cells in Culture	MRID Unavailable		OLD	See endnote ³⁵
870.7600	Dermal Penetration	265590		OLD	See endnote ³⁶
870.7800	Immunotoxicity				Not required
875.1100	Dermal Exposure – Outdoor		Agricultural Handlers Exposure Task Force	PAY	
875.1200	Dermal Exposure – Indoor	48601701	Syngenta Crop Protection	PAY	
875.1300	Inhalation Exposure – Outdoor		Agricultural Handlers Exposure Task Force	PAY	
875.1400	Inhalation Exposure – Indoor	48601701	Syngenta Crop Protection	PAY	
875.1500	Biological Monitoring		Agricultural Handlers Exposure Task Force	PAY	
875.1600	Data Reporting and Calculations		Agricultural Handlers Exposure Task Force	PAY	

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Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
875.1700	Product Use Information		Agricultural Handlers Exposure Task Force	PAY	
875.2100	Dislodgeable Foliar Residue and Turf Transferable Residues	49179502	Syngenta Crop Protection	PAY	
875.2200	Soil Residue Dissipation		Agricultural Handlers Exposure Task Force Outdoor Residential Exposure Task Force	PAY PAY	
875.2400	Dermal Exposure		Agricultural Handlers Exposure Task Force Outdoor Residential Exposure Task Force	PAY PAY	
875.2500	Inhalation Exposure		Agricultural Handlers Exposure Task Force Outdoor Residential Exposure Task Force	PAY PAY	
875.2600	Biological Monitoring		Agricultural Handlers Exposure Task Force Outdoor Residential Exposure Task Force	PAY PAY	
875.2700	Product Use Information		Agricultural Handlers Exposure Task Force Outdoor Residential Exposure Task Force	PAY PAY	

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Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
875.2800	Descriptions of Human Activity		Agricultural Handlers Exposure Task Force Outdoor Residential Exposure Task Force	PAY PAY	
875.2900	Data Reporting and Calculations		Agricultural Handlers Exposure Task Force Outdoor Residential Exposure Task Force	PAY PAY	
875.3000	Nondietary Ingestion Exposure		Agricultural Handlers Exposure Task Force Outdoor Residential Exposure Task Force	PAY PAY	
202-1	Droplet Size Spectrum	40069610		OLD	
202-2	Droplet Size Spectrum				Not required
850.4100	Tier I: Seedling Emergence			GAP	See endnote ³⁷
850.4150	Tier I: Vegetative Vigor			GAP	See endnote ³⁸
850.4400, 850.5400	Tier I: Aquatic Plant Growth	00088787 00088788		OLD	See endnote ³⁹
850.4300	Terrestrial Field				Not required
850.4450	Aquatic Field				Not required
850.4025	Target Area Phytotoxicity				Not required

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Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
850.4550	Cyanobacteria Toxicity				Not required
835.2120	Hydrolysis	131083 161178		OLD	See endnote ⁴⁰
835.2240	Photodegradation in water	49071005	Syngenta Crop Protection	PAY	See endnote ⁴¹
835.2410	Photodegradation in soil			GAP	See endnote ⁴²
835.2370	Photodegradation in air				Not required
835.4100	Aerobic Soil Metabolism	49071006 49071007 49178901	Syngenta Crop Protection	PAY PAY PAY	See endnote ⁴³
835.4200	Anaerobic Soil Metabolism	49071007	Syngenta Crop Protection	PAY	See endnote ⁴⁴
835.4300	Aerobic Aquatic Metabolism	49071003 49071004	Syngenta Crop Protection	PAY PAY	See endnote ⁴⁵
835.4400	Anaerobic Aquatic Metabolism	49071004	Syngenta Crop Protection	PAY	See endnote ⁴⁶
835.1230, 835.1240	Leaching/Adsorption/Desorption	40856301 42851526 45500501 49071002	Syngenta Crop Protection	OLD OLD OLD PAY	See endnote ⁴⁷
835.1410	Volatility – Laboratory				Not required
835.8100	Volatility – Field				Not required

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Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
835.6100	Soil Field Dissipation Study	40069610 41191501 42627601 42900002 40443012 40734501 40927102 49071013 49071014 49071015 49226802	Syngenta Crop Protection Syngenta Crop Protection Syngenta Crop Protection Syngenta Crop Protection	OLD OLD OLD OLD OLD OLD OLD PAY PAY PAY PAY	See endnote ⁴⁸
835.6200	Aquatic Sediment Field Dissipation Study	40069610 41473201		OLD OLD	See endnote ⁴⁹
860 Series					Not required

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Endnotes for Data Matrix for CSI Abamectin Technical NC

- ¹ **830.1650 – Description of Formulation Process:** These data are not required for the registration of a manufacturing use product. See 830.1620 for production process information.
- ² **850.2100 – Acute Avian Oral Toxicity:** The studies cited were classified as acceptable and/or supplemental and partially satisfy the data requirement per the Problem Formulation. MRID 49921406 appears to have been submitted in response to the Registration Review DCI.
- ³ **850.2200 – Acute Avian Dietary Toxicity:** The studies cited were classified as acceptable and satisfy the data requirement as per the Problem Formulation.
- ⁴ **850.2300 – Avian Reproductive Toxicity:** The study cited was classified as acceptable and partially satisfy the requirement per the Problem Formulation. A study on bobwhite quail was required in the Registration Review DCI but does not appear to have been submitted.
- ⁵ **850.1075 – Freshwater Fish Toxicity:** The studies cited were classified as acceptable and/or supplemental and satisfy the data requirement as per the Problem Formulation.
- ⁶ **850.1010 – Freshwater Invertebrate Toxicity:** The study cited was classified as acceptable and satisfies the requirement per the Problem Formulation.
- ⁷ **850.1075 – Estuarine/Marine Fish Toxicity:** The study cited was classified as supplemental and satisfies the requirement per the Problem Formulation.
- ⁸ **850.1025, 850.1035, 850.1045, 850.1055 – Acute Toxicity Estuarine and Marine Organisms:** The studies cited were classified as acceptable and/or supplemental and satisfy the data requirement as per the Problem Formulation.
- ⁹ **850.1300 - Aquatic Invertebrate Life Cycle (Freshwater):** The study cited is classified as acceptable and partially satisfies the requirement per the Problem Formulation. MRID 49921403 appears to have been submitted in response to the Registration Review DCI.
- ¹⁰ **850.1350 - Aquatic Invertebrate Life Cycle (Saltwater):** The study cited was classified as supplemental and satisfies the requirement per the Problem Formulation.
- ¹¹ **850.1400 – Fish Early Life Stage (Freshwater):** The study cited was classified as acceptable and satisfies the requirement per the Problem Formulation.
- ¹² **850.1400 – Fish Early Life Stage (Saltwater):** A saltwater fish study was required in the Registration Review DCI but does not appear to have been submitted.
- ¹³ **850.1710, 850.1730, 850.1850 - Aquatic Organisms Bioavailability, Biomagnification, Toxicity:** The studies cited were classified as acceptable and/or supplemental and satisfy the requirement per the Problem Formulation.
- ¹⁴ **850.1740 – Whole Sediment: Acute Marine Invertebrates:** Though not specifically required in the Problem Formulation or Registration Review DCI, MRID 49921405 appears to have been submitted to support the Registration Review.
- ¹⁵ **SS-WholeSedIn - Whole Sediment Chronic Toxicity Test: Freshwater and Marine Invertebrates:** The studies cited appear to have been submitted as required in the Registration Review.

- ¹⁶ **850.3020 – Honey Bee Acute Contact Toxicity:** The study cited was classified as acceptable and satisfies the requirement per the Problem Formulation.
- ¹⁷ **850.3030 – Honey Bee Toxicity of Residues on Foliage:** The study cited appears to have been submitted in response to the Registration Review DCI.
- ¹⁸ **850.3040 – Semi-Field Test for Pollinators:** The studies cited appear to have been submitted in response to the Registration Review DCI.
- ¹⁹ **SS-1154 – Acute Honey Bee Larvae Feeding Study:** The studies cited appear to have been submitted in response to the Registration Review DCI.
- ²⁰ **SS-1108 – Honey Bee Acute Oral Toxicity:** A non-guideline study for honey bee acute oral toxicity was required in the Registration Review DCI but does not appear to have been submitted.
- ²¹ **870.6100 – Delayed Neurotoxicity (Acute) – Rat:** The study cited has been classified as acceptable and satisfies the requirement per the Scoping Document.
- ²² **870.3100 – 90-Day Oral: Rodent:** The study cited has been classified as acceptable and satisfies the requirement per the Scoping Document.
- ²³ **870.3150 – 90-Day Oral: Non-Rodent:** The studies cited have been classified as acceptable and satisfy the requirement per the Scoping Document.
- ²⁴ **870.3200 – 21/28 Day Dermal Toxicity:** Per the Scoping Document, the requirement was waived due to very low dermal absorption.
- ²⁵ **870.3465 – 90-Day Inhalation Study:** The study cited has been classified as acceptable and satisfies the requirement per the Scoping Document.
- ²⁶ **870.6200 – 90-Day Neurotoxicity – Rat:** The studies cited have been classified as acceptable and satisfy the requirement per the Scoping Document.
- ²⁷ **870.4100 – Chronic Oral Rat:** The study cited has been classified as acceptable and satisfies the requirement per the Scoping Document.
- ²⁸ **870.4300 – Combined Chronic Toxicity/Carcinogenicity:** The studies cited have been classified as acceptable and satisfy the requirement per the Scoping Document.
- ²⁹ **870.3700 – Prenatal Development Toxicity Study:** The studies cited have been classified as acceptable and satisfy the requirement per the Scoping Document.
- ³⁰ **870.3800 – Reproduction and Fertility Effects:** The studies cited have been classified as acceptable and satisfy the requirement per the Scoping Document.
- ³¹ **870.6300 – Developmental Neurotoxicity Study:** The studies cited have been classified as acceptable and satisfy the requirement per the Scoping Document.
- ³² **870.5100 – Bacterial Reverse Mutation Test:** The studies cited have been classified as acceptable and satisfy the requirement per the Scoping Document.
- ³³ **870.5300 – *In Vitro* Mammalian Cell Assay:** The studies cited have been classified as acceptable and satisfy the requirement per the Scoping Document. Also per the Scoping Document, one study MRID from 1983 was unavailable.

- ³⁴ **870.5395 – In Vivo Cytogenetics:** The study cited has been classified as acceptable and satisfies the requirement per the Scoping Document. Per the Scoping Document, the study MRID was unavailable.
- ³⁵ **870.5550 – Unscheduled DNA Synthesis in Mammalian Cells in Culture:** The study cited has been classified as acceptable and satisfies the requirement per the Scoping Document. Per the Scoping Document, the 1983 study MRID was unavailable.
- ³⁶ **870.7600 – Dermal Penetration:** The study cited has been classified as acceptable and satisfies the requirement per the Scoping Document.
- ³⁷ **850.4100 – Tier I: Seedling Emergence:** A seedling emergence and seedling growth study was required in the Registration Review DCI but no study has been submitted.
- ³⁸ **850.4150 – Tier I: Vegetative Vigor:** A vegetative vigor study was required in the Registration Review DCI but no study has been submitted.
- ³⁹ **850.4400, 850.5400 – Tier I: Aquatic Plant Growth:** The studies cited have been classified as acceptable and satisfy the requirement per the Problem Formulation.
- ⁴⁰ **835.2120 – Hydrolysis:** The studies cited have been classified as acceptable and satisfy the requirement per the Problem Formulation.
- ⁴¹ **835.2240 – Photodegradation in Water:** The cited study appears to have been submitted in response to the Registration Review DCI.
- ⁴² **835.2410 – Photodegradation in Soil:** A photodegradation of parent and degradates in soil study was required in the Registration Review DCI but no study has been submitted.
- ⁴³ **835.4100 – Aerobic Soil Metabolism:** The cited studies appear to have been submitted in response to the Registration Review DCI.
- ⁴⁴ **835.4200 – Anaerobic Soil Metabolism:** The cited study appears to have been submitted in response to the Registration Review DCI.
- ⁴⁵ **835.4300 – Aerobic Aquatic Metabolism:** The cited studies appear to have been submitted in response to the Registration Review DCI.
- ⁴⁶ **835.4400 – Anaerobic Aquatic Metabolism:** The cited study appears to have been submitted in response to the Registration Review DCI.
- ⁴⁷ **835.1230, 835.2140 – Leaching/Adsorption/Desorption:** The studies cited have been classified as acceptable and satisfy the requirement per the Problem Formulation. MRID 49071002 appears to have been submitted despite the satisfaction of the guideline requirement.
- ⁴⁸ **835.6100 – Soil Field Dissipation Study:** The cited studies have been classified as acceptable and/or supplemental and partially satisfy the guideline requirement. MRIDs 49071013, 49071014, 49071015, and 49226802 appear to have been submitted in response to the Registration Review DCI.
- ⁴⁹ **835.6200 – Aquatic Sediment Field Dissipation Study:** The cited studies have been classified as upgradeable per the Problem Formulation. No request for additional studies was made in the Registration Review DCI and no new studies appear to have been submitted.



July 17, 2018

U.S. Environmental Protection Agency
Document Processing Desk (REGFEE)
Office of Pesticide Programs (7504P)
Room S4900, One Potomac Yard
2777 Crystal Drive
Arlington, VA 22202

Attn: Mr. Gene Benbow

**RE: R351 Amendment to Add Alternate CSF to Registration
53883-408 (CSI Abamectin Technical NC)**

Dear Mr. Benbow,

Control Solutions, Inc. wishes to add an alternate CSF #2 to the subject product. In support of this amendment application, please find the following documents:

- Application for Pesticide Registration (EPA Form 8570-1)
- Proposed Alternate Confidential Statement of Formula #2 (8570-4)
- Name change certificate for the manufacturing facility as they recently changed their name from what is listed in the preliminary analysis report.

We wish to cite the following studies to support this alternate source. They are listed on our current data matrix dated April 23, 2018 and covered under our letter of authorization from AMVAC Chemical Corp.

MRID	Description	Guideline Number(s)
50162001	Leapard, J. (2017) Abamectin Technical: Product Identity and Composition, Description of Materials Used to Produce the Product, Description of the Production Process, and Discussion of Formation of Impurities. Project Number: ARC/RP/PCV/346/P/1. Unpublished study prepared by Analytical & Regulatory Chemistry, Inc. 117p.	830.1620, 830.1670, 830.1600, 830.1550
50162002	Leapard, J. (2017) Abamectin Technical: Preliminary Analysis, Certified Limits and Enforcement Analytical Methods. Project Number: ARC/RP/PCV/347/P/1, S11/00280. Unpublished study prepared by Analytical & Regulatory Chemistry, Inc. 513p.	830.1800, 830.1700, 830.1750



Please feel free to contact me by email at leanna.bosarge@controlsolutionsinc.com or by phone at 281-892-2512 should you have any questions regarding this submission or need any additional information.

Sincerely,

A handwritten signature in black ink that reads 'Leanna Bosarge'.

Leanna Bosarge
Director, Regulatory Affairs



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
1200 Pennsylvania Avenue, N.W.
WASHINGTON, D.C. 20460

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 1.25 hours per response for registration and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, Collection Strategies Division (2822T), U.S. Environmental Protection Agency, 1200 Pennsylvania Avenue, N.W., Washington, DC 20460. Do not send the completed form to this address.

Certification with Respect to Citation of Data

Applicant's/Registrant's Name, Address, and Telephone Number Control Solutions, Inc., 5903 Genoa Red Bluff, Pasadena, TX 77507	EPA Registration Number/File Symbol 53883-XXX
Active Ingredient(s) and/or representative test compound(s) Abamectin	Date April 3, 2017
General Use Pattern(s) (list all those claimed for this product using 40 CFR Part 158) Terrestrial Non-Food, Greenhouse non-food, Residential Outdoor, Residential Indoor, Livestock	Product Name CSI Abamectin Technical NC

NOTE: If your product is a 100% repackaging of another purchased EPA-registered product labeled for all the same uses on your label, you do not need to submit this form. You must submit the Formulator's Exemption Statement (EPA Form 8570-27).

☐ I am responding to a Data-Call-In Notice, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

SECTION I: METHOD OF DATA SUPPORT (Check one method only)

☐ I am using the cite-all method of support, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

☒ I am using the selective method of support (or cite-all option under the selective method), and have included with this form a completed list of data requirements (the Data Matrix form must be used).

SECTION II: GENERAL OFFER TO PAY

[Required if using the cite-all method or when using the cite-all option under the selective method to satisfy one or more data requirements]

☒ I hereby offer and agree to pay compensation, to other persons, with regard to the approval of this application, to the extent required by FIFRA.

SECTION III: CERTIFICATION

I certify that this application for registration, this form for reregistration, or this Data-Call-In response is supported by all data submitted or cited in the application for registration, the form for reregistration, or the Data-Call-In response. In addition, if the cite-all option or cite-all option under the selective method is indicated in Section I, this application is supported by all data in the Agency's files that (1) concern the properties or effects of this product or an identical or substantially similar product, or one or more of the ingredients in this product; and (2) is a type of data that would be required to be submitted under the data requirements in effect on the date of approval of this application if the application sought the initial registration of a product of identical or similar composition and uses.

I certify that for each exclusive use study cited in support of this registration or reregistration, that I am the original data submitter or that I have obtained the written permission of the original data submitter to cite that study.

I certify that for each study cited in support of this registration or reregistration that is not an exclusive use study, either: (a) I am the original data submitter; (b) I have obtained the permission of the original data submitter to use the study in support of this application; (c) all periods of eligibility for compensation have expired for the study; (d) the study is in the public literature; or (e) I have notified in writing the company that submitted the study and have offered (i) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA; and (ii) to commence negotiations to determine the amount and terms of compensation, if any, to be paid for the use of the study.

I certify that in all instances where an offer of compensation is required, copies of all offers to pay compensation and evidence of their delivery in accordance with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA are available and will be submitted to the Agency upon request. Should I fail to produce such evidence to the Agency upon request, I understand that the Agency may initiate action to deny, cancel or suspend the registration of my product in conformity with FIFRA.

I certify that the statements I have made on this form and all attachments to it are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

Signature

Leanna Bosarge

Date

April 3, 2017

Typed or Printed Name and Title

Leanna Bosarge - Director, Regulatory Affairs



April 10, 2018

Mr. Gene Benbow, PM Team 7
Document Processing Desk (REGFEE)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202

RE: Letter of Authorization for Abamectin Technical

Dear Mr. Benbow,

Makhteshim Agan of North America Inc. (d/b/a ADAMA), the authorized agent of ADAMA Celsius Property B.V., Amsterdam (NL) (EPA Company No. 83558) is issuing this letter to support Control Solutions Inc. (EPA Company No. 53883) and the submission of a new product registration for Abamectin Technical under the EPA Number 53883-XXX. Data to support this new registration is cited from the original Abamectin Technical Registration (EPA Reg. No. 83558-26).

This authorization to the US EPA to consider our data is extended solely in connection with registration purposes as agreed upon by Adama Celsius and access is limited to Agency employees. A list of the studies to support this new registration is found in Attachment 1.

This authorization is granted only to Control Solutions, Inc. for the submission of a new Abamectin Technical registration, and said authorization includes ADAMA grant to CSI of the right for CSI to review confidential business information relating to product chemistry data.

This authorization is not to be extended or transferred to any other applicant unless stipulated in writing by Adama Celsius or its designee Makhteshim Agan of North America, Inc.

This authorization is not to be construed as an authorization to use said data directly or indirectly in support of any subsequent registration application without the express written consent of Adama Celsius or its designee Makhteshim Agan of North America, Inc.

Should you have any questions or comments pertaining to this submission, please feel free to contact me via email at karina.castro@adama.com or via phone at (919) 256-9322.

Sincerely,


Karina Castro
Federal Regulatory Manager

ADAMA

ADAMA | 3120 Highwoods Blvd. Suite 100 Raleigh, NC 27604
Telephone +1 919 256 9300 | Facsimile +1 919 256 9308 | www.adama.com



ATTACHMENT 1

ADAMA Celsius Property B.V., Amsterdam (NL) (EPA Company No. 83558) list of studies to support Control Solutions Inc. (EPA Company No. 53883)

Submission of a new product registration for Abamectin Technical for non-crop uses only under the EPA Number 53883-XXX.

ADAMA

ADAMA | 3120 Highwoods Blvd. Suite 100 Raleigh, NC 27604
Telephone +1 919 256 9300 | Facsimile +1 919 256 9308 | www.adama.com

MRID	Description
45544001	Dybas, R. (2001) Nation's AG II Abamectin Technical: Product Identity and Composition; Description of Materials Used to Produce the Product; Description of Production Process; and Discussion of Formation of Impurities: Lab Project Number: 4000-02. Unpublished study prepared by Nations Ag II. 61 p. {OPPTS 830.1550, 830.1600, 830.1620, 830.1670}
45544002	Birkholz, D. (2001) Preliminary Analysis of Technical Grade Abamectin: Lab Project Number: ETL99NA01A: 2001-04-03: ETL99NA01A.PRO. Unpublished study prepared by Enviro-Test Laboratories. 69 p. {OPPTS 830.1700}
45747501	Johnson, I.; Birkholz, F. (2001) Group B--Preliminary Analysis of Technical Grade Abamectin: Lab Project Number: ETL99NA01B: ETL99NA01B.PRO. Unpublished study prepared by Enviro-Test Laboratories. 47 p. {OPPTS 830.1700}
46299401	Lovell, S. (2004) Response to EPA Review of Product Chemistry Data on Technical Abamectin, MRID Numbers 45544001 and 45544002. Project Number: NAlI/06004. Unpublished study prepared by Nations AG II, LLC. 10p.
49212701	Miller, R. (2013) Abamectin Technical: Product Identity and Composition, Description of Materials Used to Produce the Product, Description of the Production Process, and Discussion of Formation of Impurities. Project Number: ARC/RP/PCV/340/P/1. Unpublished study prepared by Analytical & Regulatory Chemistry, Inc. 223p.
49212702	Miller, R. (2013) Abamectin Technical: Preliminary Analysis, Certified Limits and Enforcement Analytical Method. Project Number: ARC/RP/PCV/341/P/1. Unpublished study prepared by Analytical & Regulatory Chemistry, Inc. 213p.
49405501	Gordon, E. (2014) Abamectin Technical K3 Impurity: Toxicological Evaluation. Unpublished study prepared by Makhteshim Agan of North America, Inc. 8p.
49405502	Miller, R. (2014) Abamectin Technical: Product Identity and Composition, Description of Materials Used to Produce the Product, Description of the Production Process, and Discussion of Formation of Impurities: (Amended). Project Number: ARC/RP/PCV/340/P/2. Unpublished study prepared by Analytical & Regulatory Chemistry, Inc. 221p.
49405503	Miller, R. (2014) Abamectin Technical: Preliminary Analysis, Certified Limits and Enforcement Analytical Methods: (Amended). Project Number: ARC/RP/PCV/341/P/2, S11/00280, S11/00283. Unpublished study prepared by Analytical & Regulatory Chemistry, Inc. 212p.



**Control
Solutions Inc.**
A member of the ADAMA Group

April 3, 2017

U.S. Environmental Protection Agency
Document Processing Desk (REGFEE)
Office of Pesticide Programs (7504P)
Room S4900, One Potomac Yard
2777 Crystal Drive
Arlington, VA 22202

Attn: Mr. Mark Suarez

**RE: R310 Registration for a New Abamectin Technical Product Using Currently Registered Sources
53883-NEW CSI Abamectin Technical NC**

Dear Mr. Suarez,

Control Solutions, Inc. wishes to apply for a new technical registration of abamectin. This product is substantially similar in labeling and identical in composition to 83558-26. In support of this application, included please find:

Administrative Materials


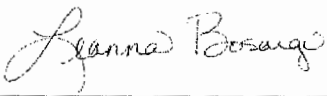
- Application for Pesticide Registration (EPA Form 8570-1)
- Confidential Statement of Formula – Basic and Alternate #1 (EPA Form 8570-4)
- Certification with Respect to Citation of Data (EPA Form 8570-34)
- Data Matrix (EPA Form 8570-35), Public and Agency Versions
- Proposed Label for CSI Abamectin Technical NC
- Copy of the PRIA Payment Receipt for an R310 Application
- Letter of Authorization from ADAMA Celsius Property B.V. (EPA Company No. 83558)

Control Solutions, Inc. is using the straight selective method of data citation. As per EPA's interpretations of 40 CFR Parts 152.93(b)(2)(i), Control Solutions, Inc. submitted notices of intent to apply and offer to pay to the extent required by FIFRA § 3(c)(1)(F). This action falls under PRIA category R310 (46: New end-use or manufacturing-use product with registered source(s) of active ingredient(s); selective data citation). The fee for this action is \$5,301 and has been paid.

Please feel free to contact me by email at leanna.bosarge@controlsolutionsinc.com or by phone at 281-892-2512 should you have any questions regarding this submission or need any additional information.

Sincerely,

Leanna Bosarge
Director, Regulatory Affairs

 United States Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460-0001		<input checked="" type="checkbox"/> Registration <input type="checkbox"/> Amendment <input type="checkbox"/> Other	OPP Identifier Number
Application for Pesticide – Section I			
1. Company/Product Number 53883-XXX		2. EPA Product Manager Mark Suarez	
4. Company/ Product (Name) CSI Abamectin Technical NC		3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted	
5. Name and Address of Applicant (Include ZIP Code) Control Solutions, Inc. 5903 Genoa-Red Bluff Pasadena, TX 77507-1041 <input type="checkbox"/> Check if this is a new address		6. Expedited Review. In accordance with FIFRA Section 3(c)(3)(b)(i) my product is similar or identical in composition and labeling to: EPA Reg. No.: 83558-26 <i>transferred to 5481-625</i> Product Name: Abamectin Technical	
Section – II			
<input type="checkbox"/> Amendment – Explain below. <input type="checkbox"/> Resubmission in response to Agency letter dated _____ <input type="checkbox"/> Notification – Explain below.		<input type="checkbox"/> Final printed labels in response to Agency letter dated _____ <input type="checkbox"/> "Me Too" Application. <input checked="" type="checkbox"/> Other – Explain below.	
Explanation: Use additional page(s) if necessary. (For Section I and Section II.) New registration application for an abamectin technical product utilizing previously approved sources with selective citation of data.			
Section – III			
1. Material This Product Will Be Packaged In:			
Child Resistant Packaging <input type="checkbox"/> Yes* <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	2. Type of Container <input type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify): _____
*Certification must be submitted		If "Yes" Unit Packaging Wt. _____ No. Per Container _____ If "Yes" Packaging Wt. _____ No. Per Container _____	
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 25 kg, 55 kg	
		5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling Accompanying Product	
6. Manner in Which Label is Affixed to Product		<input type="checkbox"/> Lithograph <input type="checkbox"/> Stenciled <input checked="" type="checkbox"/> Paper glued <input type="checkbox"/> Other	
Section – IV			
1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application).			
Name Leanna Bosarge		Title Director, Regulatory Affairs	Telephone No. (Include Area Code) (281) 892-2512
Certification			6. Date Application Received (Stamped)
I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.			
2. Signature 		3. Title Director, Regulatory Affairs	
4. Typed Name Leanna Bosarge		5. Date April 3, 2017	



ATTACHMENT 1

ADAMA Celsius Property B.V., Amsterdam (NL) (EPA Company No. 83558) list of studies to support Control Solutions Inc. (EPA Company No. 53883)

Submission of a new product registration for Abamectin Technical for non-crop uses only under the EPA Number 53883-XXX.

ADAMA

ADAMA | 3120 Highwoods Blvd. Suite 100 Raleigh, NC 27604
Telephone +1 919 256 9300 | Facsimile +1 919 256 9308 | www.adama.com

MRID	Description
45544001	Dybas, R. (2001) Nation's AG II Abamectin Technical: Product Identity and Composition; Description of Materials Used to Produce the Product; Description of Production Process; and Discussion of Formation of Impurities: Lab Project Number: 4000-02. Unpublished study prepared by Nations Ag II. 61 p. {OPPTS 830.1550, 830.1600, 830.1620, 830.1670}
45544002	Birkholz, D. (2001) Preliminary Analysis of Technical Grade Abamectin: Lab Project Number: ETL99NA01A: 2001-04-03: ETL99NA01A.PRO. Unpublished study prepared by Enviro-Test Laboratories. 69 p. {OPPTS 830.1700}
45747501	Johnson, I.; Birkholz, F. (2001) Group B--Preliminary Analysis of Technical Grade Abamectin: Lab Project Number: ETL99NA01B: ETL99NA01B.PRO. Unpublished study prepared by Enviro-Test Laboratories. 47 p. {OPPTS 830.1700}
46299401	Lovell, S. (2004) Response to EPA Review of Product Chemistry Data on Technical Abamectin, MRID Numbers 45544001 and 45544002. Project Number: NAII/06004. Unpublished study prepared by Nations AG II, LLC. 10 p.
49212701	Miller, R. (2013) Abamectin Technical: Product Identity and Composition, Description of Materials Used to Produce the Product, Description of the Production Process, and Discussion of Formation of Impurities. Project Number: ARC/RP/PCV/340/P/1. Unpublished study prepared by Analytical & Regulatory Chemistry, Inc. 223p.
49212702	Miller, R. (2013) Abamectin Technical: Preliminary Analysis, Certified Limits and Enforcement Analytical Method. Project Number: ARC/RP/PCV/341/P/1. Unpublished study prepared by Analytical & Regulatory Chemistry, Inc. 213p.
49405501	Gordon, E. (2014) Abamectin Technical K3 Impurity: Toxicological Evaluation. Unpublished study prepared by Makhteshim Agan of North America, Inc. 8p.
49405502	Miller, R. (2014) Abamectin Technical: Product Identity and Composition, Description of Materials Used to Produce the Product, Description of the Production Process, and Discussion of Formation of Impurities: (Amended). Project Number: ARC/RP/PCV/340/P/2. Unpublished study prepared by Analytical & Regulatory Chemistry, Inc. 221p.
49405503	Miller, R. (2014) Abamectin Technical: Preliminary Analysis, Certified Limits and Enforcement Analytical Methods: (Amended). Project Number: ARC/RP/PCV/341/P/2, S11/00280, S11/00283. Unpublished study prepared by Analytical & Regulatory Chemistry, Inc. 212p.
5016201	Abamectin Technical: Part A: Product Identity and Composition, Description of Materials Used to Produce the Product, Description of the Production Process, and Discussion of Formation of Impurities, Preliminary Analysis, Certified Limits and Enforcement Analytical Methods, Abamectin Technical A2a Impurity Toxicological Evaluation
5016202	
5016203	

MRID	Description
45544003	Moore, G. (2001) Acute Oral Toxicity Study in Rats: Abamectin Technical: Lab Project Number: 10833. Unpublished study prepared by Product Safety Labs. 20 p. {OPPTS 870.1100}
45544004	Moore, G. (2001) Acute Dermal Toxicity Study in Rats: Abamectin Technical: Lab Project Number: 10834. Unpublished study prepared by Product Safety Labs. 24 p. {OPPTS 870.1200}
45544005	Moore, G. (2001) Acute Inhalation Toxicity Study in Rats: Abamectin Technical: Lab Project Number: 10835. Unpublished study prepared by Product Safety Labs. 38 p. {OPPTS 870.1300}
45544006	Moore, G. (2001) Primary Eye Irritation Study in Rabbits: Abamectin Technical: Lab Project Number: 10836. Unpublished study prepared by Product Safety Labs. 15 p. {OPPTS 870.2400}
45544007	Moore, G. (2001) Primary Skin Irritation Study in Rabbits: Abamectin Technical: Lab Project Number: 10837. Unpublished study prepared by Product Safety Labs. 15 p. {OPPTS 870.2500}
45544008	Moore, G. (2001) Dermal Sensitization Study in Guinea Pigs (Buehler Method): Abamectin Technical: Lab Project Number: 10838. Unpublished study prepared by Product Safety Labs. 27 p. {OPPTS 870.2600}
46208201	Merkel, D. (2003) Acute Oral Toxicity Study in Rats - Defined LD50: Abamectin Technical. Project Number: 12651, P320. Unpublished study prepared by Product
46820901/ 46821001	Weller, P. (2006) Corrosion Characteristics Testing of an Abamectin Formulation: Final Report: Abamectin 0.15EC. Project Number: 305550/1/068. Unpublished study prepared by Midwest Research Institute. 19 p.
48132901	Hentz, K.; Williams, A.; Neal, B.; et al. (2010) OSRI Rationale: Abamectin: EDSP Order Numbers: EDSP-122804-252, EDSP-122804-260: Evaluation of Functional Equivalence of Other Scientifically Relevant Information (OSRI) to EPA's Teir 1 Screening Battery for
48158703	Yentel, J. (2010) Waiver Request for Certain Data Requirements for ABBA Ultra Miticide/Insecticide. Unpublished study prepared by Makhteshim Agan of North America, Inc. 6 p.
48614401	Coder, P. (2012) A Dose Range-Finding Oral (Gavage) Toxicity Study of Abamectin in Young Adult Rats: Final Report. Project Number: TK0055863/OCR, WIL/639121. Unpublished study prepared by WIL Research Laboratories, Inc. 167p.
48614402	Coder, P. (2012) Abamectin - A Dose Range-Finding Oral (Gavage) Toxicity Study in Young Adult Rats: Final Report. Project Number: TK0055863/OCR, WIL/639159. Unpublished study prepared by WIL Research Laboratories, Inc. 196p.
48614403	Willoughby, J. (2012) Abamectin - Androgen Receptor Binding (Rat Prostate Cytosol): Final Report. Project Number: TK0002712/OCR, 9047V/100352ARB. Unpublished study prepared by CeeTox, Inc 61p.
48614404	Wilga, P. (2012) Abamectin - Human Recombinant Aromatase Assay: Final Report. Project Number: TK0002710/OCR, 9047V/100352AROM. Unpublished study prepared by CeeTox, Inc. 71p.
48614405	Willoughby, J. (2012) Abamectin - Estrogen Receptor Binding (Rat Uterine Cytosol): Final Report. Project Number: TK0002713/OCR, 9047V/100352ERB. Unpublished study prepared by CeeTox, Inc 67p.

- 48614406 Willoughby, J. (2012) Abamectin - Estrogen Receptor Transcriptional Activation (Human Cell Line (HeLA-9903)): Final Report. Project Number: TK0002711/OCR, 9047V/100352ERTA. Unpublished
- 48614407 Wagner, H. (2012) Abamectin - H295R Steroidogenesis Assay: Final Report. Project Number: TK0002709/OCR, 9047V/100352STER. Unpublished study prepared by CeeTox, Inc. 82p.
- 48614408 Coder, P. (2012) Abamectin - Hershberger Assay in Orchidopididymectomized Rats: Final Report. Project Number: TK0002707/OCR, WIL/639124. Unpublished study prepared by WIL Research Laboratories, Inc. 454p.
- 48614409 Coder, P. (2012) Abamectin - Uterotrophic Assay in Ovariectomized Rats: Final Report. Project Number: TK0002708/OCR, WIL/639125. Unpublished study prepared by WIL Research Laboratories, Inc. 262p.
- 48675001 Lee, M. (2012) Abamectin - Amphibian Metamorphosis Assay with African Clawed Frog (*Xenopus laevis*): Final Report. Project Number: TK0002715/OCR, 1781/6762. Unpublished study prepared by Smithers Viscient Laboratories. 128p.
- 48675002 York, D. (2012) Abamectin - Fish Short-Term Reproduction Assay with Fathead Minnow (*Pimephales promelas*): Final Report. Project Number: TK0002714, 1781/6763. Unpublished study prepared by
- 48675003 York, D. (2012) Abamectin - Fish Short-Term Reproduction Assay with Fathead Minnow (*Pimephales promelas*): Final Report. Project Number: TK0002714, 1781/6763. Unpublished study prepared by Smithers Viscient Laboratories. 131p.
- 48926401 Coder, P. (2012) Abamectin - Pubertal Development and Thyroid Function in Intact Juvenile/Peripubertal Female Rats: Final Report. Project Number: WIL/639122, TK0002705. Unpublished study prepared by WIL Research. 508p.
- 48926401 Coder, P. (2012) Abamectin - Pubertal Development and Thyroid Function in Intact Juvenile/Peripubertal Female Rats: Final Report. Project Number: WIL/639122, TK0002705. Unpublished study prepared by WIL Research. 508p. AMENDED
- 48926402 Coder, P. (2012) Abamectin - Pubertal Development and Thyroid Function in Intact Juvenile/Peripubertal Male Rats: Final Report. Project Number: WIL/639123, TK0002706. Unpublished study prepared by WIL Research Laboratories, Inc. 593p.
- 49212703 Knox, K. (2013) Waiver Requests for Certain Data Requirements for Abamectin Technical. Project Number: MANA/32301. Unpublished study prepared by Makhteshim Chemical Works, Ltd. 5p.
- 5016201 Leopard, J. (2017) Product Identity and Composition, Description of Materials Used to Produce the Product, Description of the Production Process, and Discussion of the Formation of Impurities. Unpublished study prepared by ARC, Inc 117p.
- 5016202 Leopard, J. (2017) Preliminary Analysis, Certified Limits and Enforcement Analytical Methods. 513p. Waiver Requests for Certain Data Requirements for Abamectin Technical. Unpublished study prepared by ARC, Inc., 513pp.
- 5016203 Gordon, E. (2016) Abamectin Technical A2A Impurity Toxicological Evaluation. 9p.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Washington, D.C. 20460

OFFICE OF
CHEMICAL SAFETY AND
POLLUTION PREVENTION

April 12, 2018

Leanna Bosarge
Director, Regulatory Affairs
Control Solutions, Inc.
5903 Genoa Bluff
Pasadena, TX 77507

Subject: Data Authorization Deficiency
Product Name: CSI Abamectin Technical
EPA File Symbol: 53883-UNI
Application Date: 04/03/2017
OPP Decision Number: D528096

Dear Ms. Bosarge:

The Agency has received and begun its in-depth review of the subject application and has determined that it is incomplete or that further information is needed. This letter is a written notification of those deficiencies and identifies your options under 40 CFR 152.105 and Section 33 of the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended by the Pesticide Registration Improvement Extension Act (PRIA 3). Your options under 40 CFR 152.105 and section 33 of FIFRA are addressed separately because each involves a different timeframe and set of options for responding to this letter. Please ensure that you consider each of the sections below in determining how and when you respond to this letter.

40 CFR 152.105: As previously described in the telephone conversation on 4/6/2018, pursuant to 40 CFR 152.105, you are allowed 75 days from the date of this letter ending 6/26/2018 to provide a response concerning the deficiencies listed in this letter. Your response may include making corrections or additions to complete the application, or notifying the Agency of the date on which you expect to complete the application, or withdrawing your application. If you do not respond to this letter within 75 days or if you respond with a date on which you expect to complete the application but fail to meet that scheduled date, the Agency will treat the application as if you had withdrawn it. Withdrawal concludes the Agency's review of your application. Any subsequent submission of the same application must then be submitted as a new application with a new deadline for EPA to make a determination on your application and subject to a new registration service fee.

The deficiencies identified in the Agency's review at this time are:

1. The revised data matrix (submitted to update the ownership of cited studies) has excluded the following studies which were considered in the product chemistry review in support of this product: MRIDs 50162001 and 50162002.
2. Neither Letter of Authorization (both dated 4/10/18) includes MRIDs 50162001 or 50162002 in their list of permissible studies for use by Control Solutions Inc.

Further review of your application and your response to the deficiencies may identify additional deficiencies and you will be so informed.

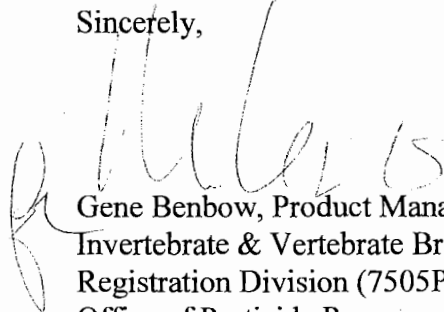
FIFRA Section 33/PRIA: This application is also subject to a deadline for making a determination on the application under FIFRA Section 33, Pesticide Registration Service Fees, established under PRIA. The time frame for the Agency to make a determination on this application ends on 4/24/2018. Because the deadline for the agency to make a determination on this application expires before the end of the 75 days you have to respond to the deficiencies noted above, you have the following three options:

1. **Establish a new due date.** You may work with us to establish a new section 33/PRIA deadline that allows for an appropriate response to the 75 day letter. If you choose this option, you need to contact the Agency not later than **4/17/2018** to discuss a time frame that allows you to address the deficiencies listed above and the Agency to make a regulatory decision.
2. **Withdraw the application.** Alternatively, you may notify us not later than **4/17/2018** that you are withdrawing your application. **As noted above, withdrawal concludes the Agency's review** of your application; however, you may resubmit your application after the deficiencies have been addressed. Should you choose to resubmit your application, it would be subject to a new deadline for making a determination on your application and a new registration service fee. Since a fee was paid with this application, the Agency will provide any applicable refund as soon as practicable.
3. **Not respond.** If the Agency does not hear from you by **4/17/2018**, the Agency in meeting its obligations under section 33/PRIA may issue a determination to not grant your application. While a determination to not grant an application would allow EPA to have met its obligation under section 33 of FIFRA to issue a determination by a specified date, this determination is neither a denial of the application pursuant to section 3(c)(6) of FIFRA or a withdrawal of the application. Thus, the Agency will continue to diligently work on any such application as long as EPA receives a response to a deficiency notice within the 75 days described above.

Please respond to this letter by **4/17/2018** by contacting Jacquelyn Herrick by telephone on 703-347-0559 or by e-mail at herrick.jacquelyn@epa.gov or contacting Gene Benbow by telephone

on 703-347-0235 or by e-mail at Benbow.gene@epa.gov during the hours of 7 am to 3 pm EST with a response and for any questions concerning this letter. When submitting information or data in response to this letter, a copy of this letter should accompany the submission to facilitate processing.

Sincerely,



Gene Benbow, Product Manager 07
Invertebrate & Vertebrate Branch 3
Registration Division (7505P)
Office of Pesticide Programs



Dispersed

March 22, 2017

Mr. Mark Suarez, PM Team 7
Document Processing Desk (REGFEE)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202

(651)-403-1044

RE: Letter of Authorization for Abamectin Technical – Non-Crop Uses Only

Dear Mr. Suarez,

Makhteshim Agan of North America Inc. (d/b/a ADAMA), the authorized agent of ADAMA Celsius Property B.V., Amsterdam (NL) (EPA Company No. 83558) is issuing this letter to support Control Solutions Inc. (EPA Company No. 53883) and the submission of a new product registration for Abamectin Technical for non-crop uses only under the EPA Number 53883-XXX. Data to support this new registration is cited from the Abamectin Technical (EPA Reg. No. 83558-26).

This authorization to the US EPA to consider our data is extended solely in connection with registration purposes for non-crop uses as agreed upon by Adama Celsius and access is limited to Agency employees. A list of the studies to support this new registration is found in Attachment 1.

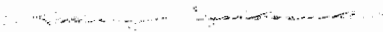
This authorization is granted only to Control Solutions, Inc. for the submission of a new non-crop only Abamectin Technical registration.

This authorization is not to be extended or transferred to any other applicant unless stipulated in writing by Adama Celsius.

This authorization is not to be construed as an authorization to use said data directly or indirectly in support of any subsequent registration application without the express written consent of Adama Celsius.

Should you have any questions or comments pertaining to this submission, please feel free to contact me via email at lauren.seabrook@adama.com or via phone at (919) 256-9357.

Sincerely,


Lauren Seabrook
Federal Regulatory Manager

ADAMA

ADAMA | 3120 Highwoods Blvd. Suite 100 Raleigh, NC 27604
Telephone +1 919 256 9300 | Facsimile +1 919 256 9308 | www.adama.com



ATTACHMENT 1

ADAMA Celsius Property B.V., Amsterdam (NL) (EPA Company No. 83558) list of studies to support Control Solutions Inc. (EPA Company No. 53883)

Submission of a new product registration for Abamectin Technical for non-crop uses only under the EPA Number 53883-XXX.

ADAMA

ADAMA | 3120 Highwoods Blvd. Suite 100 Raleigh, NC 27604
Telephone +1 919 256 9300 | Facsimile +1 919 256 9308 | www.adama.com



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DATA MATRIX

Date April 23, 2018	EPA Reg. No./File Symbol 53883-UNI	Page 1 of 14
Applicant's / Registrant's Name & Address Control Solutions Inc. 5903 Genoa Red Bluff Pasadena, TX 77507	Product Abamectin Technical NC	
Ingredient Abamectin (CAS No. 71751-41-2)		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.1550	Product Identity and Composition	45544001 49212701 49405502 50162001	Celsius Property B.V. Celsius Property B.V. Celsius Property B.V. AMVAC Chemical Corp.	PERM	
830.1600	Description of Materials Used to Produce the Product	45544001 49212701 49405502 50162001	Celsius Property B.V. Celsius Property B.V. Celsius Property B.V. AMVAC Chemical Corp.	PERM	
830.1620	Description of Production Process	45544001 49212701 49405502 50162001	Celsius Property B.V. Celsius Property B.V. Celsius Property B.V. AMVAC Chemical Corp.	PERM	
830.1650	Description of Formulation Process				Not Required ¹
830.1670	Discussion of Formation of Impurities	45544001 49212701 49405502 50162001	Celsius Property B.V. Celsius Property B.V. Celsius Property B.V. AMVAC Chemical Corp.	PERM	
830.1700	Preliminary Analysis	45544002 45747501 49212702 49405503 50162002	Celsius Property B.V. Celsius Property B.V. Celsius Property B.V. Celsius Property B.V. AMVAC Chemical Corp.	PERM	
830.1750	Certified Limits	49212702 49405503 50162002	Celsius Property B.V. Celsius Property B.V. AMVAC Chemical Corp.	PERM	
830.1800	Enforcement Analytical Method	49212702 49405503 50162002	Celsius Property B.V. Celsius Property B.V. AMVAC Chemical Corp.	PERM	

Signature 	Name and Title Leanna Bosarge, Dir. Regulatory Affairs	Date April 23, 2018
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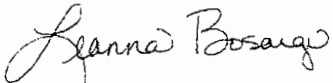
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Ingredient Abamectin (CAS No. 71751-41-2)		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.6302	Color	45747501	Celsius Property B.V.	PERM	
830.6303	Physical State	45747501	Celsius Property B.V.	PERM	
830.6304	Odor	45747501	Celsius Property B.V.	PERM	
830.6313	Stability to Normal and Elevated Temperatures, Metals, and Metal Ions	45747501	Celsius Property B.V.	PERM	
830.6314	Oxidation/Reduction: Chemical Incompatibility	49212703	AMVAC Chemical Corp.	PERM	
830.6315	Flammability	49212703	AMVAC Chemical Corp.	PERM	
830.6316	Explodability	48158703 49212703	Celsius Property B.V. AMVAC Chemical Corp.	PERM	
830.6317	Storage Stability	48158703 49212703	Celsius Property B.V. AMVAC Chemical Corp.	PERM	
830.6319	Miscibility	48158703 49212703	Celsius Property B.V. AMVAC Chemical Corp.	PERM	
830.6320	Corrosion Characteristics	46820901 46821001 48158703 49212703	AMVAC Chemical Corp.	PERM	
830.6321	Dielectric Breakdown Voltage	49212703 48158703	AMVAC Chemical Corp.	PERM	
830.7000	pH	45747501	Celsius Property B.V.	PERM	
830.7050	UV/Visible Absorption	45747501	Celsius Property B.V.	PERM	
830.7100	Viscosity	49212703	AMVAC Chemical Corp.	PERM	
830.7200	Melting Point/Melting Range	45747501	Celsius Property B.V.	PERM	
830.7220	Boiling Point/Boiling Range	49212703	AMVAC Chemical Corp.	PERM	

Signature 	Name and Title Leanna Bosarge, Dir. Regulatory Affairs	Date April 23, 2018
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Ingredient Abamectin (CAS No. 71751-41-2)		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.7300	Density/Relative Density/Bulk Density	45747501	Celsius Property B.V.	PERM	
830.7370	Dissociation Constants in Water	45747501	Celsius Property B.V.	PERM	
830.7520	Particle Size, Fiber Length, and Diameter Distribution	49212703	AMVAC Chemical Corp.	PERM	
830.7570	Partition Coefficient (n-octanol/water), Estimation by Liquid Chromatography	45747501	Celsius Property B.V.	PERM	
830.7840	Water Solubility: Column Elution Method; Shake Flask Method	45747501	Celsius Property B.V.	PERM	
830.7950	Vapor Pressure	45747501	Celsius Property B.V.	PERM	
870.1100	Acute Oral Toxicity: Rat	45544003 46208201	AMVAC Chemical Corp.	PERM	
870.1200	Acute Dermal Toxicity: Rat	45544004	AMVAC Chemical Corp.	PERM	
870.1300	Acute Inhalation Toxicity: Rat	45544005	AMVAC Chemical Corp.	PERM	
870.2400	Primary Eye Irritation: Rabbit	45544006	AMVAC Chemical Corp.	PERM	
870.2500	Primary Dermal Irritation: Rabbit	45544007	AMVAC Chemical Corp.	PERM	
870.2600	Dermal Sensitization	45544008	AMVAC Chemical Corp.	PERM	
850.2100	Acute Avian Oral Toxicity	00097859 250762 49921406	Syngenta Crop Protection	OLD OLD PAY	See endnote ²
850.2200	Acute Avian Dietary Toxicity	250761 250763		OLD OLD	See endnote ³
850.2400	Wild Mammal Toxicity				Not required
850.2300	Avian Reproductive Toxicity	40318601 49226708	Syngenta Crop Protection	OLD PAY	See endnote ⁴

Signature <i>Leanna Bosarge</i>	Name and Title Leanna Bosarge, Dir. Regulatory Affairs	Date April 23, 2018
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Ingredient Abamectin (CAS No. 71751-41-2)		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
850.2500	Simulated or Actual Field Testing				Not required
850.1075	Freshwater Fish Toxicity	00088780 00153797 00088782 00180910 00153588		OLD OLD OLD OLD OLD	See endnote ⁵
850.1010	Freshwater Invertebrate Toxicity	00088784		OLD	See endnote ⁶
850.1075	Estuarine/Marine Fish Toxicity	00150910		OLD	See endnote ⁷
850.1025, 850.1035, 850.1045, 850.1055	Acute Toxicity Estuarine and Marine Organisms	40856305 00159158 00450565		OLD OLD OLD	See endnote ⁸
850.1300	Aquatic Invertebrate Life Cycle (Freshwater)	00153570 49921403	Syngenta Crop Protection	OLD PAY	See endnote ⁹
850.1350	Aquatic Invertebrate Life Cycle (Saltwater)	00150910		OLD	See endnote ¹⁰
850.1400	Fish Early Life Stage (Freshwater)	40069609		OLD	See endnote ¹¹
850.1400	Fish Early Life Stage (Saltwater)			GAP	See endnote ¹²
850.1500	Life Cycle Fish				Not required
850.1710, 850.1730, 850.1850	Aquatic Organisms Bioavailability, Biomagnification, Toxicity	159163 161178		OLD OLD	See endnote ¹³
850.1950	Simulated or Actual Field Testing for Aquatic Organisms				Not required
850.1735	Whole sediment: Acute Freshwater Invertebrates				Not required
850.1740	Whole sediment: Acute Marine Invertebrates	49921405	Syngenta Crop Protection	PAY	See endnote ¹⁴

Signature 	Name and Title Leanna Bosarge, Dir. Regulatory Affairs	Date April 23, 2018
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Ingredient Abamectin (CAS No. 71751-41-2)		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
SS-WholeSedIn	Whole sediment Chronic Toxicity Test: Freshwater and Marine Invertebrates	49921401 49921402	Syngenta Crop Protection	PAY PAY	See endnote ¹⁵
850.3020	Honey Bee Acute Contact Toxicity	00159162		OLD	See endnote ¹⁶
850.3030	Honey Bee Toxicity of Residues on Foliage	49226801	Syngenta Crop Protection	PAY	See endnote ¹⁷
850.3040	Semi-Field Test for Pollinators	49442801 49921901	Syngenta Crop Protection	PAY PAY	See endnote ¹⁸
SS-1154	Acute Honey Bee Larvae Feeding Study	49789301 49789302	Syngenta Crop Protection	PAY PAY	See endnote ¹⁹
SS-1108	Honey Bee Acute Oral Toxicity	49226803	Syngenta Crop Protection	PAY	See endnote ²⁰
870.6100	Delayed Neurotoxicity (Acute) – Rat	46959202	Syngenta Crop Protection	PAY	See endnote ²¹
870.6200	Acute Neurotoxicity – Rat				Not required
870.3100	90-Day Oral: Rodent	00131081		OLD	See endnote ²²
870.3150	90-Day Oral: Non-Rodent	00131082 00164152		OLD OLD	See endnote ²³
870.3200	21/28 Day Dermal Toxicity				Not required ²⁴
870.3250	90-Day Dermal Toxicity				Not required
870.3465	90-Day Inhalation Toxicity	46921502	Syngenta Crop Protection	PAY	See endnote ²⁵
870.6100	28-Day Delayed Neurotoxicity Hen				Not required
870.6200	90-Day Neurotoxicity – Rat	46959201 47116201	Syngenta Crop Protection	PAY PAY	See endnote ²⁶

Signature

Name and Title

Leanna Bosarge, Dir. Regulatory Affairs

Date

April 23, 2018



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Ingredient Abamectin (CAS No. 71751-41-2)		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
870.4100	Chronic Oral Rat	40375510		OLD	See endnote ²⁷
870.4300	Combined Chronic Toxicity/Carcinogenicity	40069601 40069602 40375511 40375512 40517801		OLD OLD OLD OLD OLD	See endnote ²⁸
870.3700	Prenatal Developmental Toxicity Study	073759 073761 265564 00096446 00130819 40713406 40912701 44160501 44179902		OLD OLD OLD OLD OLD OLD OLD OLD OLD	See endnote ²⁹
870.3800	Reproduction and Fertility Effects	00164151 40713404		OLD OLD	See endnote ³⁰
870.6300	Developmental Neurotoxicity Study	46727401 46727402 46727403	Syngenta Crop Protection	PAY PAY PAY	See endnote ³¹
870.5100	Bacterial Reverse Mutation Test	246894 265568 265569 40713402 40713405		OLD OLD OLD OLD OLD	See endnote ³²
870.5300	In Vitro Mammalian Cell Assay	265570 MRID Unavailable		OLD OLD	See endnote ³³

Signature

Name and Title

Leanna Bosarge, Dir. Regulatory Affairs

Date

April 23, 2018



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Ingredient Abamectin (CAS No. 71751-41-2)		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
870.5395	<i>In Vivo</i> Cytogenetics	MRID Unavailable		OLD	See endnote ³⁴
870.5550	Unscheduled DNA Synthesis in Mammalian Cells in Culture	MRID Unavailable		OLD	See endnote ³⁵
870.7600	Dermal Penetration	265590		OLD	See endnote ³⁶
870.7800	Immunotoxicity				Not required
875.1100	Dermal Exposure – Outdoor		Agricultural Handlers Exposure Task Force	PAY	
875.1200	Dermal Exposure – Indoor	48601701	Syngenta Crop Protection	PAY	
875.1300	Inhalation Exposure – Outdoor		Agricultural Handlers Exposure Task Force	PAY	
875.1400	Inhalation Exposure – Indoor	48601701	Syngenta Crop Protection	PAY	
875.1500	Biological Monitoring		Agricultural Handlers Exposure Task Force	PAY	
875.1600	Data Reporting and Calculations		Agricultural Handlers Exposure Task Force	PAY	
875.1700	Product Use Information		Agricultural Handlers Exposure Task Force	PAY	
875.2100	Dislodgeable Foliar Residue and Turf Transferable Residues	49179502	Syngenta Crop Protection	PAY	
875.2200	Soil Residue Dissipation		Agricultural Handlers Exposure Task Force Outdoor Residential Exposure Task Force	PAY PAY	

Signature 	Name and Title Leanna Bosarge, Dir. Regulatory Affairs	Date April 23, 2018
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Ingredient Abamectin (CAS No. 71751-41-2)		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
875.2400	Dermal Exposure		Agricultural Handlers Exposure Task Force Outdoor Residential Exposure Task Force	PAY PAY	
875.2500	Inhalation Exposure		Agricultural Handlers Exposure Task Force Outdoor Residential Exposure Task Force	PAY PAY	
875.2600	Biological Monitoring		Agricultural Handlers Exposure Task Force Outdoor Residential Exposure Task Force	PAY PAY	
875.2700	Product Use Information		Agricultural Handlers Exposure Task Force Outdoor Residential Exposure Task Force	PAY PAY	
875.2800	Descriptions of Human Activity		Agricultural Handlers Exposure Task Force Outdoor Residential Exposure Task Force	PAY PAY	
875.2900	Data Reporting and Calculations		Agricultural Handlers Exposure Task Force Outdoor Residential Exposure Task Force	PAY PAY	

Signature 	Name and Title Leanna Bosarge, Dir. Regulatory Affairs	Date April 23, 2018
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DATA MATRIX

Date April 23, 2018	EPA Reg. No./File Symbol 53883-UNI	Page 9 of 14
Applicant's / Registrant's Name & Address Control Solutions Inc. 5903 Genoa Red Bluff Pasadena, TX 77507		Product Abamectin Technical NC
Ingredient Abamectin (CAS No. 71751-41-2)		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
875.3000	Nondietary Ingestion Exposure		Agricultural Handlers Exposure Task Force Outdoor Residential Exposure Task Force	PAY PAY	
202-1	Droplet Size Spectrum	40069610		OLD	
202-2	Droplet Size Spectrum				Not required
850.4100	Tier I: Seedling Emergence	49226709	Syngenta Crop Protection	PAY	See endnote ³⁷
850.4150	Tier I: Vegetative Vigor	49226710	Syngenta Crop Protection	PAY	See endnote ³⁸
850.4400, 850.5400	Tier I: Aquatic Plant Growth	00088787 00088788		OLD	See endnote ³⁹
850.4300	Terrestrial Field				Not required
850.4450	Aquatic Field				Not required
850.4025	Target Area Phytotoxicity				Not required
850.4550	Cyanobacteria Toxicity				Not required
835.2120	Hydrolysis	131083 161178		OLD	See endnote ⁴⁰
835.2240	Photodegradation in water	49071005	Syngenta Crop Protection	PAY	See endnote ⁴¹
835.2410	Photodegradation in soil	49071001	Syngenta Crop Protection	PAY	See endnote ⁴²
835.2370	Photodegradation in air				Not required

Signature 	Name and Title Leanna Bosarge, Dir. Regulatory Affairs	Date April 23, 2018
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DATA MATRIX

Date April 23, 2018	EPA Reg. No./File Symbol 53883-UNI	Page 10 of 14
Applicant's / Registrant's Name & Address Control Solutions Inc. 5903 Genoa Red Bluff Pasadena, TX 77507	Product Abamectin Technical NC	
Ingredient Abamectin (CAS No. 71751-41-2)		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
835.4100	Aerobic Soil Metabolism	49071006 49071007 49178901	Syngenta Crop Protection	PAY PAY PAY	See endnote ⁴³
835.4200	Anaerobic Soil Metabolism	49071007	Syngenta Crop Protection	PAY	See endnote ⁴⁴
835.4300	Aerobic Aquatic Metabolism	49071003 49071004	Syngenta Crop Protection	PAY PAY	See endnote ⁴⁵
835.4400	Anaerobic Aquatic Metabolism	49071004	Syngenta Crop Protection	PAY	See endnote ⁴⁶
835.1230, 835.1240	Leaching/Adsorption/Desorption	40856301 42851526 45500501 49071002	Syngenta Crop Protection	OLD OLD OLD PAY	See endnote ⁴⁷
835.1410	Volatility – Laboratory				Not required
835.8100	Volatility – Field				Not required
835.6100	Soil Field Dissipation Study	40069610 41191501 42627601 42900002 40443012 40734501 40927102 49071013 49071014 49071015 49226802	Syngenta Crop Protection Syngenta Crop Protection Syngenta Crop Protection Syngenta Crop Protection	OLD OLD OLD OLD OLD OLD OLD PAY PAY PAY PAY	See endnote ⁴⁸

Signature

Name and Title

Leanna Bosarge, Dir. Regulatory Affairs

Date

April 23, 2018



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DATA MATRIX

Date April 23, 2018	EPA Reg. No./File Symbol 53883-UNI	Page 11 of 14
Applicant's / Registrant's Name & Address Control Solutions Inc. 5903 Genoa Red Bluff Pasadena, TX 77507	Product Abamectin Technical NC	
Ingredient Abamectin (CAS No. 71751-41-2)		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
835.6200	Aquatic Sediment Field Dissipation Study	40069610 41473201		OLD OLD	See endnote ⁴⁹
860 Series					Not required

Signature 	Name and Title Leanna Bosarge, Dir. Regulatory Affairs	Date April 23, 2018
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Endnotes for Data Matrix for CSI Abamectin Technical NC

- ¹ **830.1650 – Description of Formulation Process:** These data are not required for the registration of a manufacturing use product. See 830.1620 for production process information.
- ² **850.2100 – Acute Avian Oral Toxicity:** The studies cited were classified as acceptable and/or supplemental and partially satisfy the data requirement per the Problem Formulation. MRID 49921406 appears to have been submitted in response to the Registration Review DCI.
- ³ **850.2200 – Acute Avian Dietary Toxicity:** The studies cited were classified as acceptable and satisfy the data requirement as per the Problem Formulation.
- ⁴ **850.2300 – Avian Reproductive Toxicity:** The older study cited was classified as acceptable and partially satisfy the requirement per the Problem Formulation. The newer study cited appears to have been submitted in response to the DCI.
- ⁵ **850.1075 – Freshwater Fish Toxicity:** The studies cited were classified as acceptable and/or supplemental and satisfy the data requirement as per the Problem Formulation.
- ⁶ **850.1010 – Freshwater Invertebrate Toxicity:** The study cited was classified as acceptable and satisfies the requirement per the Problem Formulation.
- ⁷ **850.1075 – Estuarine/Marine Fish Toxicity:** The study cited was classified as supplemental and satisfies the requirement per the Problem Formulation.
- ⁸ **850.1025, 850.1035, 850.1045, 850.1055 – Acute Toxicity Estuarine and Marine Organisms:** The studies cited were classified as acceptable and/or supplemental and satisfy the data requirement as per the Problem Formulation.
- ⁹ **850.1300 - Aquatic Invertebrate Life Cycle (Freshwater):** The study cited is classified as acceptable and partially satisfies the requirement per the Problem Formulation. MRID 49921403 appears to have been submitted in response to the Registration Review DCI.
- ¹⁰ **850.1350 - Aquatic Invertebrate Life Cycle (Saltwater):** The study cited was classified as supplemental and satisfies the requirement per the Problem Formulation.
- ¹¹ **850.1400 – Fish Early Life Stage (Freshwater):** The study cited was classified as acceptable and satisfies the requirement per the Problem Formulation.
- ¹² **850.1400 – Fish Early Life Stage (Saltwater):** The cited study appears to have been submitted in response to the DCI.
- ¹³ **850.1710, 850.1730, 850.1850 - Aquatic Organisms Bioavailability, Biomagnification, Toxicity:** The studies cited were classified as acceptable and/or supplemental and satisfy the requirement per the Problem Formulation.
- ¹⁴ **850.1740 – Whole Sediment: Acute Marine Invertebrates:** Though not specifically required in the Problem Formulation or Registration Review DCI, MRID 49921405 appears to have been submitted to support the Registration Review.
- ¹⁵ **SS-WholeSedIn - Whole Sediment Chronic Toxicity Test: Freshwater and Marine Invertebrates:** The studies cited appear to have been submitted as required in the Registration Review.

- ¹⁶ **850.3020 – Honey Bee Acute Contact Toxicity:** The study cited was classified as acceptable and satisfies the requirement per the Problem Formulation.
- ¹⁷ **850.3030 – Honey Bee Toxicity of Residues on Foliage:** The study cited appears to have been submitted in response to the Registration Review DCI.
- ¹⁸ **850.3040 – Semi-Field Test for Pollinators:** The studies cited appear to have been submitted in response to the Registration Review DCI.
- ¹⁹ **SS-1154 – Acute Honey Bee Larvae Feeding Study:** The studies cited appear to have been submitted in response to the Registration Review DCI.
- ²⁰ **SS-1108 – Honey Bee Acute Oral Toxicity:** The cited study appears to have been submitted in response to the DCI.
- ²¹ **870.6100 – Delayed Neurotoxicity (Acute) – Rat:** The study cited has been classified as acceptable and satisfies the requirement per the Scoping Document.
- ²² **870.3100 – 90-Day Oral: Rodent:** The study cited has been classified as acceptable and satisfies the requirement per the Scoping Document.
- ²³ **870.3150 – 90-Day Oral: Non-Rodent:** The studies cited have been classified as acceptable and satisfy the requirement per the Scoping Document.
- ²⁴ **870.3200 – 21/28 Day Dermal Toxicity:** Per the Scoping Document, the requirement was waived due to very low dermal absorption.
- ²⁵ **870.3465 – 90-Day Inhalation Study:** The study cited has been classified as acceptable and satisfies the requirement per the Scoping Document.
- ²⁶ **870.6200 – 90-Day Neurotoxicity – Rat:** The studies cited have been classified as acceptable and satisfy the requirement per the Scoping Document.
- ²⁷ **870.4100 – Chronic Oral Rat:** The study cited has been classified as acceptable and satisfies the requirement per the Scoping Document.
- ²⁸ **870.4300 – Combined Chronic Toxicity/Carcinogenicity:** The studies cited have been classified as acceptable and satisfy the requirement per the Scoping Document.
- ²⁹ **870.3700 – Prenatal Development Toxicity Study:** The studies cited have been classified as acceptable and satisfy the requirement per the Scoping Document.
- ³⁰ **870.3800 – Reproduction and Fertility Effects:** The studies cited have been classified as acceptable and satisfy the requirement per the Scoping Document.
- ³¹ **870.6300 – Developmental Neurotoxicity Study:** The studies cited have been classified as acceptable and satisfy the requirement per the Scoping Document.
- ³² **870.5100 – Bacterial Reverse Mutation Test:** The studies cited have been classified as acceptable and satisfy the requirement per the Scoping Document.
- ³³ **870.5300 – In Vitro Mammalian Cell Assay:** The studies cited have been classified as acceptable and satisfy the requirement per the Scoping Document. Also per the Scoping Document, one study MRID from 1983 was unavailable.

- ³⁴ **870.5395 – In Vivo Cytogenetics:** The study cited has been classified as acceptable and satisfies the requirement per the Scoping Document. Per the Scoping Document, the study MRID was unavailable.
- ³⁵ **870.5550 – Unscheduled DNA Synthesis in Mammalian Cells in Culture:** The study cited has been classified as acceptable and satisfies the requirement per the Scoping Document. Per the Scoping Document, the 1983 study MRID was unavailable.
- ³⁶ **870.7600 – Dermal Penetration:** The study cited has been classified as acceptable and satisfies the requirement per the Scoping Document.
- ³⁷ **850.4100 – Tier I: Seedling Emergence:** The cited study appears to have been submitted in response to the DCI.
- ³⁸ **850.4150 – Tier I: Vegetative Vigor:** The cited study appears to have been submitted in response to the DCI.
- ³⁹ **850.4400, 850.5400 – Tier I: Aquatic Plant Growth:** The studies cited have been classified as acceptable and satisfy the requirement per the Problem Formulation.
- ⁴⁰ **835.2120 – Hydrolysis:** The studies cited have been classified as acceptable and satisfy the requirement per the Problem Formulation.
- ⁴¹ **835.2240 – Photodegradation in Water:** The cited study appears to have been submitted in response to the Registration Review DCI.
- ⁴² **835.2410 – Photodegradation in Soil:** The cited study appears to have been submitted in response to the DCI.
- ⁴³ **835.4100 – Aerobic Soil Metabolism:** The cited studies appear to have been submitted in response to the Registration Review DCI.
- ⁴⁴ **835.4200 – Anaerobic Soil Metabolism:** The cited study appears to have been submitted in response to the Registration Review DCI.
- ⁴⁵ **835.4300 – Aerobic Aquatic Metabolism:** The cited studies appear to have been submitted in response to the Registration Review DCI.
- ⁴⁶ **835.4400 – Anaerobic Aquatic Metabolism:** The cited study appears to have been submitted in response to the Registration Review DCI.
- ⁴⁷ **835.1230, 835.2140 – Leaching/Adsorption/Desorption:** The studies cited have been classified as acceptable and satisfy the requirement per the Problem Formulation. MRID 49071002 appears to have been submitted despite the satisfaction of the guideline requirement.
- ⁴⁸ **835.6100 – Soil Field Dissipation Study:** The cited studies have been classified as acceptable and/or supplemental and partially satisfy the guideline requirement. MRIDs 49071013, 49071014, 49071015, and 49226802 appear to have been submitted in response to the Registration Review DCI.
- ⁴⁹ **835.6200 – Aquatic Sediment Field Dissipation Study:** The cited studies have been classified as upgradeable per the Problem Formulation. No request for additional studies was made in the Registration Review DCI and no new studies appear to have been submitted.



U.S. ENVIRONMENTAL PROTECTION AGENCY

Office of Pesticide Programs
Registration Division (7505P)
1200 Pennsylvania Ave., N.W.
Washington, D.C. 20460

EPA Reg. Number:

53883-408

Date of Issuance:

4/24/18

NOTICE OF PESTICIDE:

☒ Registration
☐ Reregistration
(under FIFRA, as amended)

Term of Issuance:

Conditional

Name of Pesticide Product:

CSI Abamectin Technical NC

Name and Address of Registrant (include ZIP Code):

Leanna Bosarge
Control Solutions, Inc.
5903 Genoa Bluff
Pasadena, TX 77507

Note: Changes in labeling differing in substance from that accepted in connection with this registration must be submitted to and accepted by the Registration Division prior to use of the label in commerce. In any correspondence on this product always refer to the above EPA registration number.

On the basis of information furnished by the registrant, the above named pesticide is hereby registered under the Federal Insecticide, Fungicide and Rodenticide Act.

Registration is in no way to be construed as an endorsement or recommendation of this product by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with the Act. The acceptance of any name in connection with the registration of a product under this Act is not to be construed as giving the registrant a right to exclusive use of the name or to its use if it has been covered by others.

This product is conditionally registered in accordance with FIFRA section 3(c)(7)(A). You must comply with the following conditions:

1. Submit and/or cite all data required for registration/reregistration/registration review of your product under FIFRA when the Agency requires all registrants of similar products to submit such data.

Signature of Approving Official:

Sincerely,

Gene Benbow, Product Manager 7
Invertebrate & Vertebrate Branch 3
Registration Division (7505P)
Office of Pesticide Programs

Date:

4/24/18

2. You are required to comply with the data requirements described in the DCI or EDSP Order identified below:

- a. Abamectin GDCI-128804

You must comply with all of the data requirements within the established deadlines. If you have questions about the Generic DCI or EDSP Order listed above, you may contact the Chemical Review Manager in the Pesticide Reevaluation Division:

<http://iaspub.epa.gov/apex/pesticides/f?p=chemicalsearch:1>

3. Make the following label changes before you release the product for shipment:
 - Revise the EPA Registration Number to read, "EPA Reg. No. 53883-408."
4. Submit one copy of the final printed label for the record before you release the product for shipment.

Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance.

If you fail to satisfy these data requirements, EPA will consider appropriate regulatory action including, among other things, cancellation under FIFRA section 6(e). Your release for shipment of the product constitutes acceptance of these conditions. A stamped copy of the label is enclosed for your records. Please also note that the record for this product currently contains the following CSFs:

- Basic CSF dated 03/31/2017
- Alternate CSF 1 dated 03/31/2017

If you have any questions, please contact Jacquelyn Herrick by phone at 703-347-0559, or via email at herrick.jacquelyn@epa.gov.

Enclosure

[Text in brackets and italics are notes to the label editor.]
 [Text in brackets alone are optional statements or alternative statements.]

CSI Abamectin Technical NC

For Manufacturing Use Only

ACTIVE INGREDIENT:

Abamectin (CAS No. 65195-55-3 and CAS No. 65195-56-4)..... 97.6%

OTHER INGREDIENTS: 2.4%

TOTAL: 100.00%



Manufactured for:
 Control Solutions, Inc.
 5903 Genoa Red Bluff
 Pasadena, TX 77507



EPA Reg. No: 53883-XXX
 EPA Est. No: _____
 Net Contents: _____
 Lot No.: _____

KEEP OUT OF REACH OF CHILDREN

WARNING

FIRST AID	
IF SWALLOWED:	<ul style="list-style-type: none"> • Call a poison control center or doctor immediately for treatment advice. • Have person sip a glass of water if able to swallow. • Do not induce vomiting unless told to do so by a poison control center or doctor. • Do not give anything by mouth to an unconscious person.
IF ON SKIN OR CLOTHING:	<ul style="list-style-type: none"> • Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15-20 minutes. • Call a poison control center or doctor for treatment advice.
IF INHALED:	<ul style="list-style-type: none"> • Move person to fresh air. • If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible. • Call a poison control center or doctor for further treatment advice.
IF IN EYES:	<ul style="list-style-type: none"> • Hold eye open and rinse slowly and gently with water for 15-20 minutes. • Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. • Call a poison control center or doctor for treatment advice.
HOT LINE NUMBER	
Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact SafetyCall® (866) 897-8050 for emergency medical treatment information.	
NOTE TO PHYSICIAN: Early signs of intoxication include dilation of pupils, muscular incoordination, and muscular tremors. Toxicity following accidental ingestion of the technical product can be minimized by vomiting within one-half hour of exposure; rapidly after exposure (<15 minutes) administer repeatedly medical charcoal in a large quantity of water or ipecac. If toxicity from exposure has progressed to cause severe vomiting, the extent of resultant fluid and electrolyte imbalance should be gauged. Appropriate supportive parenteral fluid replacement therapy should be given, along with other required supportive measures (such as maintenance of blood pressure levels and proper respiratory functionality) as indicated by clinical signs, symptoms, and measurements. In severe cases, observations should continue for at least several days until clinical condition is stable and normal. Since abamectin is believed to enhance GABA activity in animals, it is probably wise to avoid drugs that enhance GABA activity (barbiturates, benzodiazepines, valproic acid) in patients with potentially toxic abamectin exposure.	

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

WARNING: May be fatal if swallowed, absorbed through skin or if inhaled. Causes moderate eye irritation. Do not breathe dust. Do not get in eyes, on skin, or on clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco, or using the toilet. Remove and wash contaminated clothing before reuse. Keep container tightly closed. Keep away from food, drink, and animal feeding stuffs.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

Wear coveralls over short sleeved shirt and short pants, socks, chemical resistant footwear, chemical resistant gloves made of: barrier laminate, butyl rubber (> 14 mils), nitrile rubber (> 14 mils), neoprene rubber (> 14 mils), natural rubber (> 14 mils), polyethylene, polyvinyl chloride (PVC) (> 14 mils), or viton (> 14 mils) and goggles. Wear a minimum of a NIOSH-approved particulate filtering faceplate respirator with any N, R, or P filter (TC-84P) OR an elastometric NIOSH-approved particulate respirator with an N, R, or P filter OR a NIOSH powered air purifying respirator with an HE filter (TC-21C).

ENVIRONMENTAL HAZARDS

This product is toxic to fish and wildlife. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or other waters unless in accordance with requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the sewage treatment plant authority.

For guidance, contact your State Water Board or Regional Office of the Environmental Protection Agency.

DIRECTIONS FOR USE

It is a violation of federal law to use this product in a manner inconsistent with its labeling.

This product is for the formulation of insecticide baits and non-food crop insecticide/miticide spray formulations and is not for resale under this label.

1. **Agricultural premises not accessible to livestock and around equipment (Indoor Non-Food, Terrestrial Non-Food):** Around barns, chicken houses, and agricultural equipment.
2. **Commercial and Industrial use (Indoor, Terrestrial Non-Food):** In and around commercial, institutional, and industrial premises such as warehouses, hotels, motels, resorts, apartment buildings, food storage areas, meat packing and food processing plants, food handling establishments, supermarkets, restaurants, non-patient occupied areas of hospitals and nursing homes, schools, commercial transportation equipment such as buses, boats, ships, trains, aircraft except aircraft cabins, utility conduits, and utility boxes.
3. **Household (Domestic indoor and outdoor use):** In and around residential buildings such as homes, apartments, garages, sheds, storage buildings, and other household and domestic structures.
4. **Livestock (Terrestrial Food):** Cattle ear tags
5. **Ornamental plants (Terrestrial Non-Food, Greenhouse Non-Food):** Ornamental herbaceous plants, ornamental woody shrubs and vines, ornamental and/or shade trees, ornamental nonflowering plants, and Christmas tree plantations.
6. **Turf and other outdoor areas (Domestic Outdoor, Terrestrial Non-Food):** Ornamental lawns and turf, commercial sod farms, golf courses. Noncrop areas: landscapes, recreation areas (fairgrounds, race tracks, tennis courts, and parks).
7. **Other Uses:** Uses for which the US EPA has accepted the required data and/or citations of data that the formulator has submitted in support of registration excluding any use strictly prohibited by this label. Uses for experimental purposes that are in compliance with the US EPA's requirements.



April 10, 2018

Mr. Gene Benbow, PM Team
7 Document Processing Desk
(REGFEE) Office of Pesticide
Programs (7504P)
U.S. Environmental
Protection Agency Room
S4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202

RE: Letter of Authorization for Abamectin Technical

Dear Mr. Benbow,

AMVAC Chemical Corporation (EPA Company No. 5481) is issuing this letter to support Control Solutions Inc. (EPA Company No. 53883) and the submission of a new product registration for Abamectin Technical under the EPA Number 53883-XXX. Data to support this new registration is cited from the AMVAC Abamectin Technical Registration (EPA Reg. No. XXXXX-XX).

This authorization to the US EPA to consider our data is extended solely in connection with registration purposes as agreed upon by AMVAC and access is limited to Agency employees. A list of the studies to support this new registration is found in Attachment 1.

This authorization is granted only to Control Solutions, Inc. for the submission of a new Abamectin Technical registration. This authorization is not to be extended or transferred to any other applicant unless stipulated in writing by AMVAC. This authorization is not to be construed as an authorization to use said data directly or indirectly in support of any subsequent registration application without the express written consent of AMVAC.

Should you have any questions or comments pertaining to this submission, please feel free to contact me via email at timd@amvac-chemical.com or via phone at (949)221-6115.

Sincerely,

A handwritten signature in black ink, appearing to read 'Timothy J. Donnelly', with a large, stylized loop at the end.

Timothy J. Donnelly
CAO, General Counsel & Secretary
AMVAC Chemical Corporation

SCHEDULE 1

MRID	Description
45544003	Moore, G. (2001) Acute Oral Toxicity Study in Rats: Abamectin Technical: Lab Project Number: 10833. Unpublished study prepared by Product Safety Labs. 20 p. {OPPTS 870.1100}
45544004	Moore, G. (2001) Acute Dermal Toxicity Study in Rats: Abamectin Technical: Lab Project Number: 10834. Unpublished study prepared by Product Safety Labs. 24 p. {OPPTS 870.1200}
45544005	Moore, G. (2001) Acute Inhalation Toxicity Study in Rats: Abamectin Technical: Lab Project Number: 10835. Unpublished study prepared by Product Safety Labs. 38 p. {OPPTS 870.1300}
45544006	Moore, G. (2001) Primary Eye Irritation Study in Rabbits: Abamectin Technical: Lab Project Number: 10836. Unpublished study prepared by Product Safety Labs. 15 p. {OPPTS 870.2400}
45544007	Moore, G. (2001) Primary Skin Irritation Study in Rabbits: Abamectin Technical: Lab Project Number: 10837. Unpublished study prepared by Product Safety Labs. 15 p. {OPPTS 870.2500}
45544008	Moore, G. (2001) Dermal Sensitization Study in Guinea Pigs (Buehler Method): Abamectin Technical: Lab Project Number: 10838. Unpublished study prepared by Product Safety Labs. 27 p. {OPPTS 870.2600}
46208201	Merkel, D. (2003) Acute Oral Toxicity Study in Rats - Defined LD50: Abamectin Technical. Project Number: 12651, P320. Unpublished study prepared by Product
46820901468 21001	Weller, P. (2006) Corrosion Characteristics Testing of an Abamectin Formulation: Final Report: Abamectin 0.15EC. Project Number: 305550/1/068. Unpublished study prepared by Midwest Research Institute. 19 p.
48132901	Hentz, K.; Williams, A.; Neal, B.; et al. (2010) OSRI Rationale: Abamectin: EDSP Order Numbers: EDSP-122804-252, EDSP-122804-260: Evaluation of Functional Equivalence of Other Scientifically Relevant Information (OSRI) to EPA's Teir 1 Screening Battery for

- 48158703 Yentel, J. (2010) Waiver Request for Certain Data Requirements for ABBA Ultra Miticide/Insecticide. Unpublished study prepared by Makhteshim Agan of North America, Inc. 6 p.
- 48614401 Coder, P. (2012) A Dose Range-Finding Oral (Gavage) Toxicity Study of Abamectin in Young Adult Rats: Final Report. Project Number: TK0055863/OCR, WIL/639121. Unpublished study prepared by WIL Research Laboratories, Inc. 167p.
- 48614402 Coder, P. (2012) Abamectin - A Dose Range-Finding Oral (Gavage) Toxicity Study in Young Adult Rats: Final Report. Project Number: TK0055863/OCR, WIL/639159. Unpublished study prepared by WIL Research Laboratories, Inc. 196p.
- 48614403 Willoughby, J. (2012) Abamectin - Androgen Receptor Binding (Rat Prostate Cytosol): Final Report. Project Number: TK0002712/OCR, 9047V/100352ARB. Unpublished study prepared by CeeTox, Inc. 61p.
- 48614404 Wilga, P. (2012) Abamectin - Human Recombinant Aromatase Assay: Final Report. Project Number: TK0002710/OCR, 9047V/100352AROM. Unpublished study prepared by CeeTox, Inc. 71p.
- 48614405 Willoughby, J. (2012) Abamectin - Estrogen Receptor Binding (Rat Uterine Cytosol): Final Report. Project Number: TK0002713/OCR, 9047V/100352ERB. Unpublished study prepared by CeeTox, Inc. 67p.
- 48614406 Willoughby, J. (2012) Abamectin - Estrogen Receptor Transcriptional Activation (Human Cell Line (HeLA-9903)): Final Report. Project Number: TK0002711/OCR, 9047V/100352ERTA. Unpublished
- 48614407 Wagner, H. (2012) Abamectin - H295R Steroidogenesis Assay: Final Report. Project Number: TK0002709/OCR, 9047V/100352STER. Unpublished study prepared by CeeTox, Inc. 82p.
- 48614408 Coder, P. (2012) Abamectin - Hershberger Assay in Orchidectomy-mutilated Rats: Final Report. Project Number: TK0002707/OCR, WIL/639124. Unpublished study prepared by WIL Research Laboratories, Inc. 454p.
- 48614409 Coder, P. (2012) Abamectin - Uterotrophic Assay in Ovariectomized Rats: Final Report. Project Number: TK0002708/OCR, WIL/639125. Unpublished study prepared by WIL Research Laboratories, Inc. 262p.
- 48675001 Lee, M. (2012) Abamectin - Amphibian Metamorphosis Assay with African Clawed Frog (*Xenopus laevis*): Final Report. Project Number: TK0002715/OCR, 1781/6762. Unpublished study prepared by Smithers Visient Laboratories. 128p.

48675002	York, D. (2012) Abamectin - Fish Short-Term Reproduction Assay with Fathead Minnow (<i>Pimephales promelas</i>): Final Report. Project Number: TK0002714, 1781/6763. Unpublished study prepared by
48675003	York, D. (2012) Abamectin - Fish Short-Term Reproduction Assay with Fathead Minnow (<i>Pimephales promelas</i>): Final Report. Project Number: TK0002714, 1781/6763. Unpublished study prepared by Smithers Viscient Laboratories. 131p.
48926401	Coder, P. (2012) Abamectin - Pubertal Development and Thyroid Function in Intact Juvenile/Peripubertal Female Rats: Final Report. Project Number: WIL/639122, TK0002705. Unpublished study prepared by WIL Research. 508p.
48926401	Coder, P. (2012) Abamectin - Pubertal Development and Thyroid Function in Intact Juvenile/Peripubertal Female Rats: Final Report. Project Number: WIL/639122, TK0002705. Unpublished study prepared by WIL Research. 508p.AMENDED
48926402	Coder, P. (2012) Abamectin - Pubertal Development and Thyroid Function in Intact Juvenile/Peripubertal Male Rats: Final Report. Project Number: WIL/639123, TK0002706. Unpublished study prepared by WIL Research Laboratories, Inc. 593p.
49212703	Knox, K. (2013) Waiver Requests for Certain Data Requirements for Abamectin Technical. Project Number: MANA/32301. Unpublished study prepared by Makhteshim Chemical Works, Ltd. 5p.
5016201	Leapard, J. (2017) Product Identity and Composition, Description of Materials Used to Produce the Product, Description of the Production Process, and Discussion of the Formation of Impurities. Unpublished study prepared by ARC, Inc 117p.
5016202	Leapard, J. (2017) Preliminary Analysis, Certified Limits and Enforcement Analytical Methods. 513p. Waiver Requests for Certain Data Requirements for Abamectin Technical. Unpublished study prepared by ARC, Inc., 513pp.
5016203	Gordon, E. (2016) Abamectin Technical A2A Impurity Toxicological Evaluation. 9p.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

PESTICIDE STORAGE: Store CSI Abamectin Technical NC in a cool, dry place away from food, drink, and animal feeding stuffs. If spilled, do not flush to waterways (see **ENVIRONMENTAL HAZARDS**). Carefully collect and containerize spilled material in a manner that produces the least amount of airborne dust. Wear suitable protective equipment during any spill cleanup operation (see **PRECAUTIONARY STATEMENTS**). Remove residual surface material with towels moistened with methanol.

PESTICIDE DISPOSAL: Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of federal law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

CONTAINER HANDLING: Nonrefillable container. Do not reuse or refill this container. Offer for recycling if available.

Polyliner (Plastic bag): Completely empty bag into application equipment. Offer for recycling if available or dispose of bag in a sanitary landfill or by other procedures allowed by state and local authorities.

Plastic Containers: Nonrefillable container. Do not reuse or refill this container. Clean container promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank. Fill the container 1/4 full with water. Replace and tighten closures. Tip container on its side and roll it back and forth, ensuring at least one complete revolution, for 30 seconds. Stand the container on its end and tip it back and forth several times. Turn the container over onto its other end and tip it back and forth several times. Empty the rinsate into formulation equipment or a mix tank or store rinsate for later use or disposal. Repeat this procedure two more times. Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill or by other procedures allowed by state and local authorities.

Metal Container: Nonrefillable container. Do not reuse or refill this container. Clean container promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank. Fill the container 1/4 full with water. Replace and tighten closures. Tip container on its side and roll it back and forth, ensuring at least one complete revolution, for 30 seconds. Stand the container on its end and tip it back and forth several times. Turn the container over onto its other end and tip it back and forth several times. Empty the rinsate into formulation equipment or a mix tank or store rinsate for later use or disposal. Repeat this procedure two more times. Then offer for recycling, if available, or reconditioning, or if appropriate, puncture and dispose of in a sanitary landfill, or by other procedures approved by State and local authorities.

WARRANTY STATEMENT

The Directions for Use of this product must be followed carefully. It is impossible to eliminate all risks inherently associated with the use of this product. Ineffectiveness or other unintended consequences may result because of such factors as manner of use or application, weather, presence of other materials or other influencing factors in the use of the product, which are beyond the control of Control Solutions, Inc. or Seller. All such risks shall be assumed by Buyer and User, and Buyer and User agree to hold Control Solutions, Inc. and Seller harmless for any claims relating to such factors.

To the extent consistent with applicable law, Control Solutions, Inc. warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated in the Directions for Use, subject to the inherent risks referred to above, when used in accordance with directions under normal use conditions. This warranty does not extend to the use of this product contrary to label instructions, or under abnormal conditions or under conditions not reasonably foreseeable to or beyond the control of Seller or Control Solutions, Inc., and Buyer and User assume the risk of any such use. CONTROL SOLUTIONS, INC. MAKES NO WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE NOR ANY OTHER EXPRESS OR IMPLIED WARRANTY EXCEPT AS STATED ABOVE.

To the extent consistent with applicable law, IT IS **CONTROL SOLUTIONS INC., AND SELLERS INTENTION THAT** in no event shall Control Solutions or Seller be liable for any incidental, consequential or special damages resulting from the use or handling of this product. **THE EXCLUSIVE REMEDY OF THE**

USER OR BUYER, AND THE EXCLUSIVE LIABILITY OF CONTROL SOLUTIONS, INC., AND SELLER FOR ANY AND ALL CLAIMS, LOSSES, INJURIES OR DAMAGES (INCLUDING CLAIMS BASED ON BREACH OF WARRANTY, CONTRACT, NEGLIGENCE, TORT, STRICT LIABILITY OR OTHERWISE) RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, SHALL BE THE RETURN OF THE PURCHASE PRICE OF THE PRODUCT OR, AT THE ELECTION OF CONTROL SOLUTIONS, INC. OR SELLER, THE REPLACEMENT OF THE PRODUCT.

To the extent consistent with applicable law, Control Solutions, Inc. and Seller offer this product, and Buyer and User accept it, subject to the foregoing Conditions of Sale and Limitation of Warranty and Liability, which may not be modified except by written agreement signed by a duly authorized representative of Control Solutions, Inc.



Control
Solutions, Inc.

July 17, 2018

U.S. Environmental Protection Agency
Document Processing Desk (REGFEE)
Office of Pesticide Programs (7504P)
Room S4900, One Potomac Yard
2777 Crystal Drive
Arlington, VA 22202

Attn: Mr. Gene Benbow

**RE: R351 Amendment to Add Alternate CSF to Registration
53883-408 (CSI Abamectin Technical NC)**

Dear Mr. Benbow,

Control Solutions, Inc. wishes to add an alternate CSF #2 to the subject product. In support of this amendment application, please find the following documents:

- Application for Pesticide Registration (EPA Form 8570-1)
- Proposed Alternate Confidential Statement of Formula #2 (8570-4)
- Name change certificate for the manufacturing facility as they recently changed their name from what is listed in the preliminary analysis report.

We wish to cite the following studies to support this alternate source. They are listed on our current data matrix dated April 23, 2018 and covered under our letter of authorization from AMVAC Chemical Corp.

MRID	Description	Guideline Number(s)
50162001	Leapard, J. (2017) Abamectin Technical: Product Identity and Composition, Description of Materials Used to Produce the Product, Description of the Production Process, and Discussion of Formation of Impurities. Project Number: ARC/RP/PCV/346/P/1. Unpublished study prepared by Analytical & Regulatory Chemistry, Inc. 117p.	830.1620, 830.1670, 830.1600, 830.1550
50162002	Leapard, J. (2017) Abamectin Technical: Preliminary Analysis, Certified Limits and Enforcement Analytical Methods. Project Number: ARC/RP/PCV/347/P/1, S11/00280. Unpublished study prepared by Analytical & Regulatory Chemistry, Inc. 513p.	830.1800, 830.1700, 830.1750


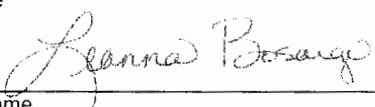


Control
Solutions Inc.

Please feel free to contact me by email at leanna.bosarge@controlsolutionsinc.com or by phone at 281-892-2512 should you have any questions regarding this submission or need any additional information.

Sincerely,

Leanna Bosarge
Director, Regulatory Affairs

 United States Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460-0001		<input type="checkbox"/> Registration <input checked="" type="checkbox"/> Amendment <input type="checkbox"/> Other	OPP Identifier Number
Application for Pesticide – Section I			
1. Company/Product Number 53883-408		2. EPA Product Manager Gene Benbow	
4. Company/ Product (Name) CSI Abamectin Technical NC		3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted	
5. Name and Address of Applicant (Include ZIP Code) Control Solutions, Inc. 5903 Genoa-Red Bluff Pasadena, TX 77507-1041 <input type="checkbox"/> Check if this is a new address		6. Expedited Review. In accordance with FIFRA Section 3(c)(3)(b)(i) my product is similar or identical in composition and labeling to: EPA Reg. No.: Product Name:	
Section – II			
<input checked="" type="checkbox"/> Amendment – Explain below. <input type="checkbox"/> Resubmission in response to Agency letter dated _____ <input type="checkbox"/> Notification – Explain below.		<input type="checkbox"/> Final printed labels in response to Agency letter dated _____ <input type="checkbox"/> "Me Too" Application. <input type="checkbox"/> Other – Explain below.	
Explanation: Use additional page(s) if necessary. (For Section I and Section II.) R351 Amendment to add an alternate, unregistered source of active ingredient.			
Section – III			
1. Material This Product Will Be Packaged In:			
Child Resistant Packaging <input type="checkbox"/> Yes* <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	2. Type of Container <input type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify): _____
*Certification must be submitted		If "Yes" Unit Packaging Wt.	No. Per Container
		If "Yes" Packaging Wt.	No. Per Container
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 1 kg, 25 kg, 55 kg	
		5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling Accompanying Product	
6. Manner in Which Label is Affixed to Product		<input type="checkbox"/> Lithograph <input type="checkbox"/> Stenciled <input checked="" type="checkbox"/> Paper glued <input type="checkbox"/> Other	
Section – IV			
1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application).			
Name Leanna Bosarge		Title Director, Regulatory Affairs	Telephone No. (Include Area Code) (281) 892-2512
Certification			6. Date Application Received (Stamped)
I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.			
2. Signature 		3. Title Director, Regulatory Affairs	
4. Typed Name Leanna Bosarge		5. Date July 17, 2018	



Receipt

Your payment is complete

Pay.gov Tracking ID: 26B0TNIB

Agency Tracking ID: 75532084512

Form Name: Pesticide Registration Improvement Act - Prepayment

Application Name: PRIA Service Fees

Payment Information

Payment Type: Debit or credit card

Payment Amount: \$13,226.00

Transaction Date: 07/17/2018 03:12:44 PM EDT

Payment Date: 07/17/2018

Registration Number: 53883-408

Company Name: Control Solutions, Inc.

Company Number: 53883

Action Code: R351

Account Information

Cardholder Name: Control Solutions, Inc.

Card Type: Visa

Card Number: *****9070

Email Confirmation Receipt

Confirmation Receipts have been emailed to:
leanna.bosarge@controlsolutionsinc.com

2018 JUL 17 PM 03:12

CSI Abamectin Technical NC

For Manufacturing Use Only

ACTIVE INGREDIENT:

Abamectin (CAS No. 65195-55-3 and CAS No. 65195-56-4)..... 97.6%

OTHER INGREDIENTS: 2.4%

TOTAL: 100.00%



Manufactured for:
Control Solutions, Inc.
5903 Genoa Red Bluff
Pasadena, TX 77507

EPA Reg. No: 53883-XXX
EPA Est. No: _____
Net Contents: _____

KEEP OUT OF REACH OF CHILDREN WARNING

FIRST AID	
IF SWALLOWED:	<ul style="list-style-type: none">• Call a poison control center or doctor immediately for treatment advice.• Have person sip a glass of water if able to swallow.• Do not induce vomiting unless told to do so by a poison control center or doctor.• Do not give anything by mouth to an unconscious person.
IF INHALED:	<ul style="list-style-type: none">• Move person to fresh air.• If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible.• Call a poison control center or doctor for further treatment advice.
IF ON SKIN OR CLOTHING:	<ul style="list-style-type: none">• Take off contaminated clothing.• Rinse skin immediately with plenty of water for 15-20 minutes.• Call a poison control center or doctor for treatment advice.
IF IN EYES:	<ul style="list-style-type: none">• Hold eye open and rinse slowly and gently with water for 15-20 minutes.• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.• Call a poison control center or doctor for treatment advice.
HOT LINE NUMBER	
Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact SafetyCall® (866) 897-8050 for emergency medical treatment information.	
NOTE TO PHYSICIAN: Early signs of intoxication include dilation of pupils, muscular incoordination, and muscular tremors. Toxicity following accidental ingestion of the technical product can be minimized by vomiting within one-half hour of exposure; rapidly after exposure (<15 minutes) administer repeatedly medical charcoal in a large quantity of water or ipecac. If toxicity from exposure has progressed to cause severe vomiting, the extent of resultant fluid and electrolyte imbalance should be gauged. Appropriate supportive parenteral fluid replacement therapy should be given, along with other required supportive measures (such as maintenance of blood pressure levels and proper respiratory functionality) as indicated by clinical signs, symptoms, and measurements. In severe cases, observations should continue for at least several days until clinical condition is stable and normal. Since abamectin is believed to enhance GABA activity in animals, it is probably wise to avoid	

drugs that enhance GABA activity (barbiturates, benzodiazepines, valproic acid) in patients with potentially toxic abamectin exposure.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

WARNING: May be fatal if inhaled, swallowed, or absorbed through skin. Causes moderate eye irritation. Do not breathe dust. Do not get in eyes, on skin, or on clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco, or using the toilet. Remove and wash contaminated clothing before reuse. Keep container tightly closed. Keep away from food, drink, and animal feeding stuffs.

The following protective clothing must be worn during all handling and formulation operations: Airline mask or airsupplied hood; chemical-resistant goggles and gloves; full body garments with shoe protectors and head cover. Disposable clothing is recommended.

ENVIRONMENTAL HAZARDS

This product is toxic to fish and wildlife. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or other waters unless in accordance with requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the sewage treatment plant authority.

For guidance, contact your State Water Board or Regional Office of the Environmental Protection Agency.

DIRECTIONS FOR USE

It is a violation of federal law to use this product in a manner inconsistent with its labeling.

This product is for the formulation of insecticide baits and non-food crop insecticide/miticide spray formulations and is not for resale under this label.

1. **Agricultural premises not accessible to livestock and around equipment (Indoor Non-Food, Terrestrial Non-Food):** Around barns, chicken houses, and agricultural equipment.
2. **Commercial and Industrial use (Indoor, Terrestrial Non-Food):** In and around commercial, institutional, and industrial premises such as warehouses, hotels, motels, resorts, apartment buildings, food storage areas, meat packing and food processing plants, food handling establishments, supermarkets, restaurants, non-patient occupied areas of hospitals and nursing homes, schools, commercial transportation equipment such as buses, boats, ships, trains, aircraft except aircraft cabins, utility conduits, and utility boxes.
3. **Household (Domestic indoor and outdoor use):** In and around residential buildings such as homes, apartments, garages, sheds, storage buildings, and other household and domestic structures.
4. **Livestock (Terrestrial Food):** Cattle ear tags
5. **Ornamental plants (Terrestrial Non-Food, Greenhouse Non-Food):** Ornamental herbaceous plants, ornamental woody shrubs and vines, ornamental and/or shade trees, ornamental nonflowering plants, and Christmas tree plantations.
6. **Turf and other outdoor areas (Domestic Outdoor, Terrestrial Non-Food):** Ornamental lawns and turf, commercial sod farms, golf courses. Noncropped areas such as landscapes, recreation areas such as fairgrounds, race tracks, tennis courts, and parks.
7. **Other Uses:** Uses for which the US EPA has accepted the required data and/or citations of data that the formulator has submitted in support of registration excluding any use strictly prohibited by this label. Uses for experimental purposes that are in compliance with the US EPA's requirements.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

PESTICIDE STORAGE: Store CSI Abamectin Technical NC in a cool, dry place away from food, drink, and animal feeding stuffs. If spilled, do not flush to waterways (see **ENVIRONMENTAL HAZARDS**). Carefully collect and containerize spilled material in a manner that produces the least amount of airborne dust. Wear suitable protective equipment during any spill cleanup operation (see **PRECAUTIONARY STATEMENTS**). Remove residual surface material with towels moistened with methanol.

PESTICIDE DISPOSAL: Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of federal law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

CONTAINER HANDLING: Nonrefillable container. Do not reuse or refill this container. Offer for recycling if available.

Polyliner (Plastic bag): Completely empty bag into application equipment. Then dispose of bag in a sanitary landfill, by incineration, or if allowed by State and local authorities, by burning. If burned, stay out of smoke.

Plastic Containers: Nonrefillable container. Do not reuse or refill this container. Offer for recycling, if available. Clean container promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank. Fill the container 1/4 full with water. Replace and tighten closures. Tip container on its side and roll it back and forth, ensuring at least one complete revolution, for 30 seconds. Stand the container on its end and tip it back and forth several times. Turn the container over onto its other end and tip it back and forth several times. Empty the rinsate into formulation equipment or a mix tank or store rinsate for later use or disposal. Repeat this procedure two more times. Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, by incineration or, if allowed by State and local authorities, by burning. If burned stay out of smoke.

Metal Container: Nonrefillable container. Do not reuse or refill this container. Offer for recycling, if available. Clean container promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank. Fill the container 1/4 full with water. Replace and tighten closures. Tip container on its side and roll it back and forth, ensuring at least one complete revolution, for 30 seconds. Stand the container on its end and tip it back and forth several times. Turn the container over onto its other end and tip it back and forth several times. Empty the rinsate into formulation equipment or a mix tank or store rinsate for later use or disposal. Repeat this procedure two more times. Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other procedures approved by State and local authorities. For final disposal, offer for recycling or reconditioning if appropriate, or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities.

WARRANTY STATEMENT

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To the extent consistent with applicable law, Control Solutions, Inc. warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated in the Directions for Use, subject to the inherent risks referred to above, when used in accordance with directions under normal use conditions. This warranty does not extend to the use of this product contrary to label instructions, or under abnormal conditions or under conditions not reasonably foreseeable to or beyond the control of Seller or Control Solutions, Inc., and Buyer and User assume the risk of any such use. CONTROL SOLUTIONS,

INC. MAKES NO WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE NOR ANY OTHER EXPRESS OR IMPLIED WARRANTY EXCEPT AS STATED ABOVE.

To the extent consistent with applicable law, IT IS **CONTROL SOLUTIONS INC., AND SELLERS INTENTION THAT** in no event shall Control Solutions or Seller be liable for any incidental, consequential or special damages resulting from the use or handling of this product. **THE EXCLUSIVE REMEDY OF THE USER OR BUYER, AND THE EXCLUSIVE LIABILITY OF CONTROL SOLUTIONS, INC., AND SELLER FOR ANY AND ALL CLAIMS, LOSSES, INJURIES OR DAMAGES (INCLUDING CLAIMS BASED ON BREACH OF WARRANTY, CONTRACT, NEGLIGENCE, TORT, STRICT LIABILITY OR OTHERWISE) RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, SHALL BE THE RETURN OF THE PURCHASE PRICE OF THE PRODUCT OR, AT THE ELECTION OF CONTROL SOLUTIONS, INC. OR SELLER, THE REPLACEMENT OF THE PRODUCT.**

To the extent consistent with applicable law, Control Solutions, Inc. and Seller offer this product, and Buyer and User accept it, subject to the foregoing Conditions of Sale and Limitation of Warranty and Liability, which may not be modified except by written agreement signed by a duly authorized representative of Control Solutions, Inc.



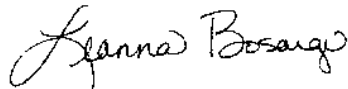
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401 M Street, S.W.
WASHINGTON, D.C. 20460

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DATA MATRIX

Date April 3, 2017	EPA Reg. No./File Symbol 53883-XXX	Page 1 of 14
Applicant's / Registrant's Name & Address Control Solutions Inc. 5903 Genoa Red Bluff Pasadena, TX 77507	Product Abamectin Technical NC	
Ingredient Abamectin (CAS No. 71751-41-2)		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
			Celsius Property B.V.	PERM	
			Celsius Property B.V.	PERM	
			Celsius Property B.V.	PERM	
					Not Required ¹
			Celsius Property B.V.	PERM	
			Celsius Property B.V.	PERM	
			Celsius Property B.V.	PERM	

Signature 	Name and Title Leanna Bosarge, Dir. Regulatory Affairs	Date April 3, 2017
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401 M Street, S.W.
WASHINGTON, D.C. 20460

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Signature 	Name and Title Leanna Bosarge, Dir. Regulatory Affairs	Date April 3, 2017
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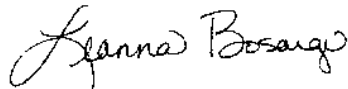
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			Celsius Property B.V.	PERM	

Signature 	Name and Title Leanna Bosarge, Dir. Regulatory Affairs	Date April 3, 2017
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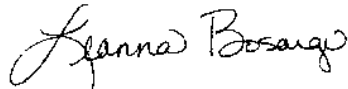
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DATA MATRIX

Date April 3, 2017	EPA Reg. No./File Symbol 53883-XXX	Page 4 of 14
Applicant's / Registrant's Name & Address Control Solutions Inc. 5903 Genoa Red Bluff Pasadena, TX 77507	Product Abamectin Technical NC	
Ingredient Abamectin (CAS No. 71751-41-2)		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
			Syngenta Crop Protection	OLD OLD PAY	See endnote ²
				OLD OLD	See endnote ³
					Not required
				OLD GAP	See endnote ⁴
					Not required
				OLD OLD OLD OLD OLD	See endnote ⁵
				OLD	See endnote ⁶
				OLD	See endnote ⁷
				OLD OLD OLD	See endnote ⁸
			Syngenta Crop Protection	OLD PAY	See endnote ⁹
				OLD	See endnote ¹⁰
				OLD	See endnote ¹¹
				GAP	See endnote ¹²
					Not required

Signature 	Name and Title Leanna Bosarge, Dir. Regulatory Affairs	Date April 3, 2017
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Ingredient Abamectin (CAS No. 71751-41-2)		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
				OLD OLD	See endnote ¹³
					Not required
					Not required
			Syngenta Crop Protection	PAY	See endnote ¹⁴
			Syngenta Crop Protection	PAY PAY	See endnote ¹⁵
				OLD	See endnote ¹⁶
			Syngenta Crop Protection	PAY	See endnote ¹⁷
			Syngenta Crop Protection	PAY PAY	See endnote ¹⁸
			Syngenta Crop Protection	PAY PAY	See endnote ¹⁹
				GAP	See endnote ²⁰
			Syngenta Crop Protection	PAY	See endnote ²¹
					Not required
				OLD	See endnote ²²
				OLD OLD	See endnote ²³
					Not required ²⁴
					Not required

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Ingredient Abamectin (CAS No. 71751-41-2)		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
			Syngenta Crop Protection	PAY	See endnote ²⁵
					Not required
			Syngenta Crop Protection	PAY PAY	See endnote ²⁶
				OLD	See endnote ²⁷
				OLD OLD OLD OLD OLD	See endnote ²⁸
				OLD OLD OLD OLD OLD OLD OLD OLD	See endnote ²⁹
				OLD OLD	See endnote ³⁰
			Syngenta Crop Protection	PAY PAY PAY	See endnote ³¹

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Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
				OLD OLD OLD OLD OLD	See endnote ³²
				OLD OLD	See endnote ³³
				OLD	See endnote ³⁴
				OLD	See endnote ³⁵
				OLD	See endnote ³⁶
					Not required
			Agricultural Handlers Exposure Task Force	PAY	
			Syngenta Crop Protection	PAY	
			Agricultural Handlers Exposure Task Force	PAY	
			Syngenta Crop Protection	PAY	
			Agricultural Handlers Exposure Task Force	PAY	
			Agricultural Handlers Exposure Task Force	PAY	

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Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
			Agricultural Handlers Exposure Task Force	PAY	
			Syngenta Crop Protection	PAY	
			Agricultural Handlers Exposure Task Force	PAY	
			Outdoor Residential Exposure Task Force	PAY	
			Agricultural Handlers Exposure Task Force	PAY	
			Outdoor Residential Exposure Task Force	PAY	
			Agricultural Handlers Exposure Task Force	PAY	
			Outdoor Residential Exposure Task Force	PAY	

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Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
			Agricultural Handlers Exposure Task Force	PAY	
			Outdoor Residential Exposure Task Force	PAY	
			Agricultural Handlers Exposure Task Force	PAY	
			Outdoor Residential Exposure Task Force	PAY	
			Agricultural Handlers Exposure Task Force	PAY	
			Outdoor Residential Exposure Task Force	PAY	
				OLD	
					Not required
				GAP	See endnote ³⁷
				GAP	See endnote ³⁸
				OLD	See endnote ³⁹
					Not required

Signature 	Name and Title Leanna Bosarge, Dir. Regulatory Affairs	Date April 3, 2017
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Ingredient Abamectin (CAS No. 71751-41-2)		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
					Not required
				OLD	See endnote ⁴⁰
			Syngenta Crop Protection	PAY	See endnote ⁴¹
				GAP	See endnote ⁴²
					Not required
			Syngenta Crop Protection	PAY PAY PAY	See endnote ⁴³
			Syngenta Crop Protection	PAY	See endnote ⁴⁴
			Syngenta Crop Protection	PAY PAY	See endnote ⁴⁵
			Syngenta Crop Protection	PAY	See endnote ⁴⁶
			Syngenta Crop Protection	OLD OLD OLD PAY	See endnote ⁴⁷
					Not required
					Not required

Signature 	Name and Title Leanna Bosarge, Dir. Regulatory Affairs	Date April 3, 2017
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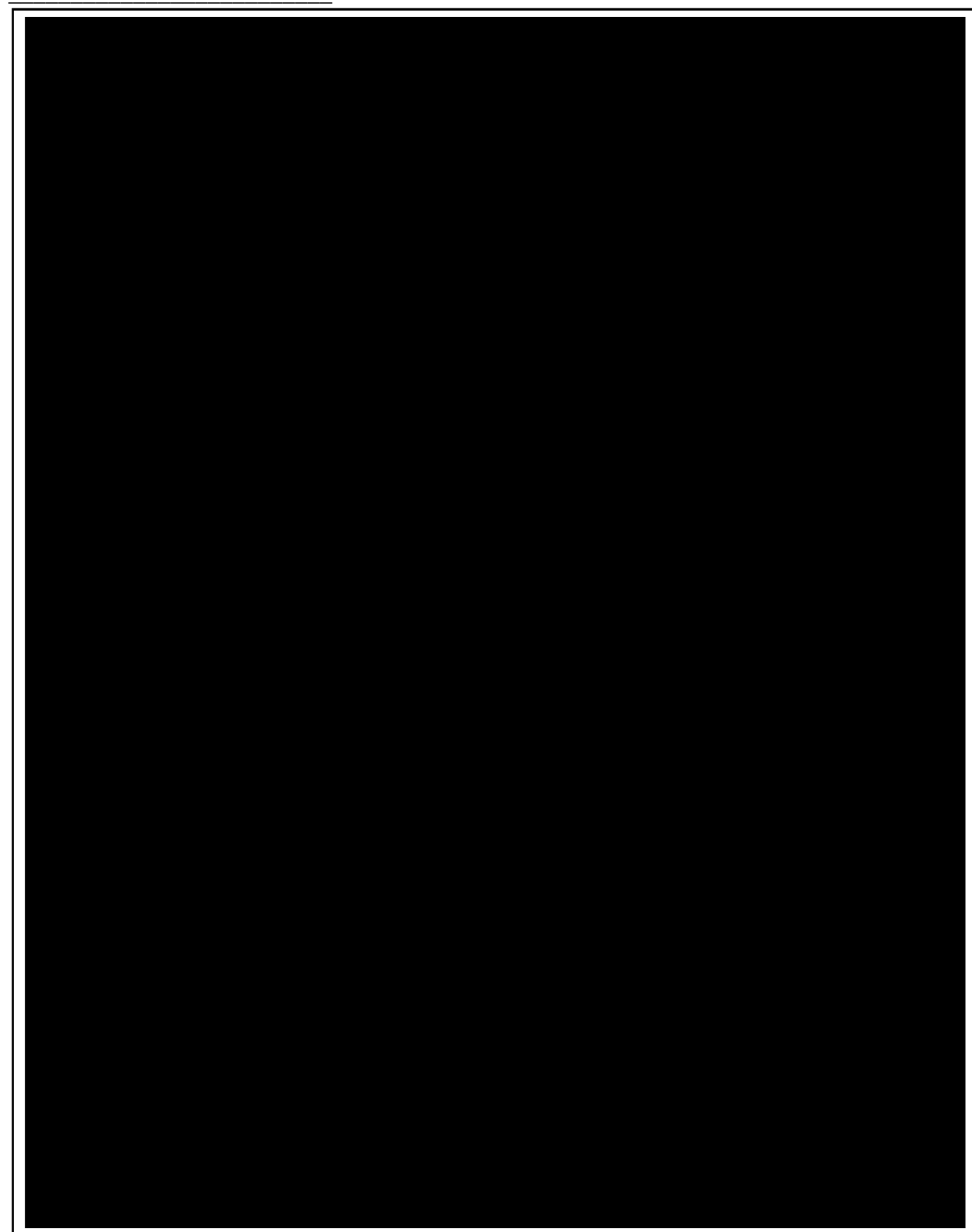
DATA MATRIX

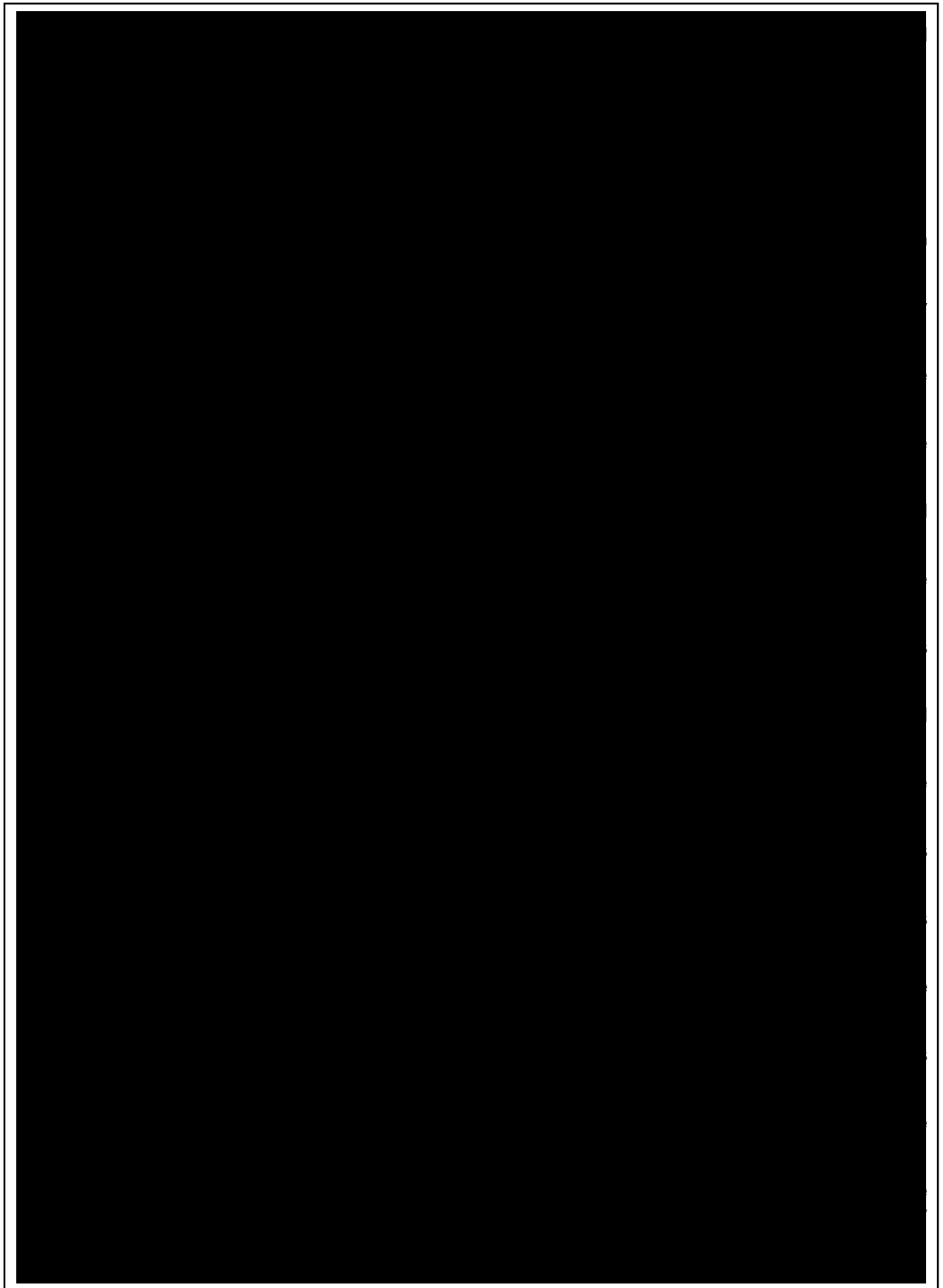
Date	April 3, 2017	EPA Reg. No./File Symbol	53883-XXX	Page 11 of 14
Applicant's / Registrant's Name & Address	Control Solutions Inc. 5903 Genoa Red Bluff Pasadena, TX 77507	Product	Abamectin Technical NC	
Ingredient	Abamectin (CAS No. 71751-41-2)			

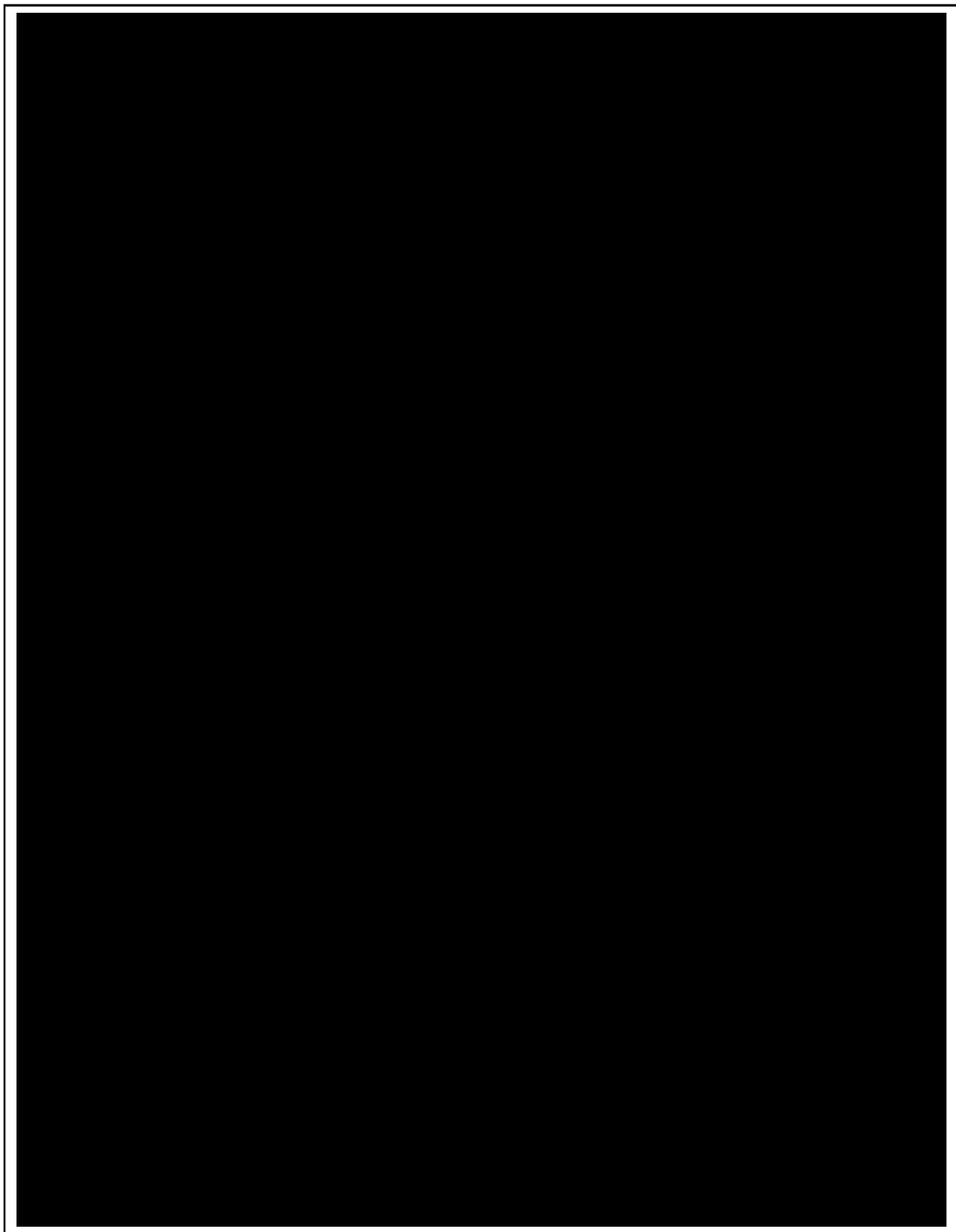
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Signature	Name and Title	Date
	Leanna Bosarge, Dir. Regulatory Affairs	April 3, 2017

Endnotes for Data Matrix for CSI Abamectin Technical NC









March 22, 2017

Mr. Mark Suarez, PM Team 7
Document Processing Desk (REGFEE)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202

RE: Letter of Authorization for Abamectin Technical – Non-Crop Uses Only

Dear Mr. Suarez,

Makhteshim Agan of North America Inc. (d/b/a ADAMA), the authorized agent of ADAMA Celsius Property B.V., Amsterdam (NL) (EPA Company No. 83558) is issuing this letter to support Control Solutions Inc. (EPA Company No. 53883) and the submission of a new product registration for Abamectin Technical for non-crop uses only under the EPA Number 53883-XXX. Data to support this new registration is cited from the Abamectin Technical (EPA Reg. No. 83558-26).

This authorization to the US EPA to consider our data is extended solely in connection with registration purposes for non-crop uses as agreed upon by Adama Celsius and access is limited to Agency employees. A list of the studies to support this new registration is found in Attachment 1.

This authorization is granted only to Control Solutions, Inc. for the submission of a new non-crop only Abamectin Technical registration.

This authorization is not to be extended or transferred to any other applicant unless stipulated in writing by Adama Celsius.

This authorization is not to be construed as an authorization to use said data directly or indirectly in support of any subsequent registration application without the express written consent of Adama Celsius.

Should you have any questions or comments pertaining to this submission, please feel free to contact me via email at lauren.seabrook@adama.com or via phone at (919) 256-9357.

Sincerely,

Lauren Seabrook
Federal Regulatory Manager

ADAMA

ADAMA | 3120 Highwoods Blvd. Suite 100 Raleigh, NC 27604
Telephone +1 919 256 9300 | Facsimile +1 919 256 9308 | www.adama.com



ATTACHMENT 1

ADAMA Celsius Property B.V., Amsterdam (NL) (EPA Company No. 83558) list of studies to support Control Solutions Inc. (EPA Company No. 53883)

Submission of a new product registration for Abamectin Technical for non-crop uses only under the EPA Number 53883-XXX.

ADAMA

ADAMA | 3120 Highwoods Blvd. Suite 100 Raleigh, NC 27604
Telephone +1 919 256 9300 | Facsimile +1 919 256 9308 | www.adama.com

MRID	Description
45544001	Dybas, R. (2001) Nation's AG II Abamectin Technical: Product Identity and Composition; Description of Materials Used to Produce the Product: Description of Production Process; and Discussion of Formation of Impurities: Lab Project Number: 4000-02. Unpublished study prepared by Nations Ag II. 61 p. {OPPTS 830.1550, 830.1600, 830.1620, 830.1670}
45544002	Birkholz, D. (2001) Preliminary Analysis of Technical Grade Abamectin: Lab Project Number: ETL99NA01A: 2001-04-03: ETL99NA01A.PRO. Unpublished study prepared by Enviro-Test Laboratories. 69 p. {OPPTS 830.1700}
45747501	Johnson, I.; Birkholz, F. (2001) Group B--Preliminary Analysis of Technical Grade Abamectin: Lab Project Number: ETL99NA01B: ETL99NA01B.PRO. Unpublished study prepared by Enviro-Test Laboratories. 47 p. {OPPTS 830.1700}
46299401	Lovell, S. (2004) Response to EPA Review of Product Chemistry Data on Technical Abamectin, MRID Numbers 45544001 and 45544002. Project Number: NAIL/06004. Unpublished study prepared by Nations AG II, LLC. 10 p.
49212701	Miller, R. (2013) Abamectin Technical: Product Identity and Composition, Description of Materials Used to Produce the Product, Description of the Production Process, and Discussion of Formation of Impurities. Project Number: ARC/RP/PCV/340/P/1. Unpublished study prepared by Analytical & Regulatory Chemistry, Inc. 223p.
49212702	Miller, R. (2013) Abamectin Technical: Preliminary Analysis, Certified Limits and Enforcement Analytical Method. Project Number: ARC/RP/PCV/341/P/1. Unpublished study prepared by Analytical & Regulatory Chemistry, Inc. 213p.
49405501	Gordon, E. (2014) Abamectin Technical K3 Impurity: Toxicological Evaluation. Unpublished study prepared by Makhteshim Agan of North America, Inc. 8p.
49405502	Miller, R. (2014) Abamectin Technical: Product Identity and Composition, Description of Materials Used to Produce the Product, Description of the Production Process, and Discussion of Formation of Impurities: (Amended). Project Number: ARC/RP/PCV/340/P/2. Unpublished study prepared by Analytical & Regulatory Chemistry, Inc. 221p.
49405503	Miller, R. (2014) Abamectin Technical: Preliminary Analysis, Certified Limits and Enforcement Analytical Methods: (Amended). Project Number: ARC/RP/PCV/341/P/2, S11/00280, S11/00283. Unpublished study prepared by Analytical & Regulatory Chemistry, Inc. 212p.
5016201	Abamectin Technical: Part A: Product Identity and Composition, Description of Materials Used to
5016202	Produce the Product, Description of the Production Process, and Discussion of Formation of
5016203	Impurities, Preliminary Analysis, Certified Limits and Enforcement Analytical Methods, Abamectin Technical A2a Impurity Toxicological Evaluation

MRID	Description
45544003	Moore, G. (2001) Acute Oral Toxicity Study in Rats: Abamectin Technical: Lab Project Number: 10833. Unpublished study prepared by Product Safety Labs. 20 p. {OPPTS 870.1100}
45544004	Moore, G. (2001) Acute Dermal Toxicity Study in Rats: Abamectin Technical: Lab Project Number: 10834. Unpublished study prepared by Product Safety Labs. 24 p. {OPPTS 870.1200}
45544005	Moore, G. (2001) Acute Inhalation Toxicity Study in Rats: Abamectin Technical: Lab Project Number: 10835. Unpublished study prepared by Product Safety Labs. 38 p. {OPPTS 870.1300}
45544006	Moore, G. (2001) Primary Eye Irritation Study in Rabbits: Abamectin Technical: Lab Project Number: 10836. Unpublished study prepared by Product Safety Labs. 15 p. {OPPTS 870.2400}
45544007	Moore, G. (2001) Primary Skin Irritation Study in Rabbits: Abamectin Technical: Lab Project Number: 10837. Unpublished study prepared by Product Safety Labs. 15 p. {OPPTS 870.2500}
45544008	Moore, G. (2001) Dermal Sensitization Study in Guinea Pigs (Buehler Method): Abamectin Technical: Lab Project Number: 10838. Unpublished study prepared by Product Safety Labs. 27 p. {OPPTS 870.2600}
46208201	Merkel, D. (2003) Acute Oral Toxicity Study in Rats - Defined LD50: Abamectin Technical. Project Number: 12651, P320. Unpublished study prepared by Product
46820901/ 46821001	Weller, P. (2006) Corrosion Characteristics Testing of an Abamectin Formulation: Final Report: Abamectin 0.15EC. Project Number: 305550/1/068. Unpublished study prepared by Midwest Research Institute. 19 p.
48132901	Hentz, K.; Williams, A.; Neal, B.; et al. (2010) OSRI Rationale: Abamectin: EDSP Order Numbers: EDSP-122804-252, EDSP-122804-260: Evaluation of Functional Equivalence of Other Scientifically Relevant Information (OSRI) to EPA's Teir 1 Screening Battery for
48158703	Yentel, J. (2010) Waiver Request for Certain Data Requirements for ABBA Ultra Miticide/Insecticide. Unpublished study prepared by Makhteshim Agan of North America, Inc. 6 p.
48614401	Coder, P. (2012) A Dose Range-Finding Oral (Gavage) Toxicity Study of Abamectin in Young Adult Rats: Final Report. Project Number: TK0055863/OCR, WIL/639121. Unpublished study prepared by WIL Research Laboratories, Inc. 167p.
48614402	Coder, P. (2012) Abamectin - A Dose Range-Finding Oral (Gavage) Toxicity Study in Young Adult Rats: Final Report. Project Number: TK0055863/OCR, WIL/639159. Unpublished study prepared by WIL Research Laboratories, Inc. 196p.
48614403	Willoughby, J. (2012) Abamectin - Androgen Receptor Binding (Rat Prostate Cytosol): Final Report. Project Number: TK0002712/OCR, 9047V/100352ARB. Unpublished study prepared by CeeTox, Inc 61p.
48614404	Wilga, P. (2012) Abamectin - Human Recombinant Aromatase Assay: Final Report. Project Number: TK0002710/OCR, 9047V/100352AROM. Unpublished study prepared by CeeTox, Inc. 71p.
48614405	Willoughby, J. (2012) Abamectin - Estrogen Receptor Binding (Rat Uterine Cytosol): Final Report. Project Number: TK0002713/OCR, 9047V/100352ERB. Unpublished study prepared by CeeTox, Inc 67p.

48614406 Willoughby, J. (2012) Abamectin - Estrogen Receptor Transcriptional Activation (Human Cell Line (HeLA-9903)): Final Report. Project Number: TK0002711/OCR, 9047V/100352ERTA. Unpublished

48614407 Wagner, H. (2012) Abamectin - H295R Steroidogenesis Assay: Final Report. Project Number: TK0002709/OCR, 9047V/100352STER. Unpublished study prepared by CeeTox, Inc. 82p.

48614408 Coder, P. (2012) Abamectin - Hershberger Assay in Orchidopidymectomized Rats: Final Report. Project Number: TK0002707/OCR, WIL/639124. Unpublished study prepared by WIL Research Laboratories, Inc. 454p.

48614409 Coder, P. (2012) Abamectin - Uterotrophic Assay in Ovariectomized Rats: Final Report. Project Number: TK0002708/OCR, WIL/639125. Unpublished study prepared by WIL Research Laboratories, Inc. 262p.

48675001 Lee, M. (2012) Abamectin - Amphibian Metamorphosis Assay with African Clawed Frog (*Xenopus laevis*): Final Report. Project Number: TK0002715/OCR, 1781/6762. Unpublished study prepared by Smithers Viscient Laboratories. 128p.

48675002 York, D. (2012) Abamectin - Fish Short-Term Reproduction Assay with Fathead Minnow (*Pimephales promelas*): Final Report. Project Number: TK0002714, 1781/6763. Unpublished study prepared by

48675003 York, D. (2012) Abamectin - Fish Short-Term Reproduction Assay with Fathead Minnow (*Pimephales promelas*): Final Report. Project Number: TK0002714, 1781/6763. Unpublished study prepared by Smithers Viscient Laboratories. 131p.

48926401 Coder, P. (2012) Abamectin - Pubertal Development and Thyroid Function in Intact Juvenile/Peripubertal Female Rats: Final Report. Project Number: WIL/639122, TK0002705. Unpublished study prepared by WIL Research. 508p.

48926401 Coder, P. (2012) Abamectin - Pubertal Development and Thyroid Function in Intact Juvenile/Peripubertal Female Rats: Final Report. Project Number: WIL/639122, TK0002705. Unpublished study prepared by WIL Research. 508p. AMENDED

48926402 Coder, P. (2012) Abamectin - Pubertal Development and Thyroid Function in Intact Juvenile/Peripubertal Male Rats: Final Report. Project Number: WIL/639123, TK0002706. Unpublished study prepared by WIL Research Laboratories, Inc. 593p.

49212703 Knox, K. (2013) Waiver Requests for Certain Data Requirements for Abamectin Technical. Project Number: MANA/32301. Unpublished study prepared by Makhteshim Chemical Works, Ltd. 5p.

5016201 Leopard, J. (2017) Product Identity and Composition, Description of Materials Used to Produce the Product, Description of the Production Process, and Discussion of the Formation of Impurities. Unpublished study prepared by ARC, Inc 117p.

5016202 Leopard, J. (2017) Preliminary Analysis, Certified Limits and Enforcement Analytical Methods. 513p. Waiver Requests for Certain Data Requirements for Abamectin Technical. Unpublished study prepared by ARC, Inc., 513pp.

5016203 Gordon, E. (2016) Abamectin Technical A2A Impurity Toxicological Evaluation. 9p.